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8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 IN RE SONY VAIO COMPUTER
11 NOTEBOOK TRACKPAD
12 LITIGATION

Case No.: 3:09-cv-02109-BAS-MDD
CLASS ACTION
PRETRIAL ORDER

Hon. Cynthia A. Bashant

1 Following pretrial proceedings, pursuant to Federal Rules of Civil Procedure 16
2 and Local Rule 16, **IT IS SO ORDERED:**

3 1. The jury will be read the following statement of the nature of the case and
4 the claims and defenses:

5

6 This is a class action case filed by Plaintiffs and Class
7 Representatives, Christina Egner and Rickey Glasco, on behalf of
8 all class members who are California or New Jersey residents who
9 purchased certain Sony VAIO brand laptop computers (“class
10 products”). Plaintiffs allege the Sony laptop computers were
11 designed and sold with a defect. Sony denies all allegations.

12

13 2. The following claims will be tried to a jury: California Consumers Legal
14 Remedies Act (CLRA) (Cal. Civ. Code § 1770, *et seq.*), New Jersey Consumer Fraud
15 Act (NJCFA); Magnuson Moss Warranty Act (MMWA) (15 U.S.C. § 2301), and
16 Breach of Implied Warranty (Cal. Comm. Code § 2314, Cal. Civ. Code §§ 1791, *et seq.*,
17 N.J. Rev. Stat. Annot. 12A:2-314). The following claim will be tried to the Court:
18 Unlawful and Unfair Business Practices (Cal. Bus. & Prof. Code § 17200, *et seq.*). The
19 elements, damages, and defenses for the claims asserted are as follows:

20 a. **Violation of California’s Consumer Legal Remedies Act (Cal. Civ**
21 **Code § 1770, et seq.; Second Amended Complaint ¶¶75-89)**

22

i. Elements of the Claim – *Plaintiffs*:

23

1. Defendant manufactured the products;

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2. The products contained a material defect that Defendant
25 knew, but was not known to the plaintiffs;

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3. Defendant did not disclose the defect to Plaintiffs or the
27 members of the class;

28

- 1 4. Defendant's omission(s) were material to a reasonable
- 2 consumer because the class products contained a design
- 3 defect that is likely to manifest; and
- 4 5. Defendant's representations were a substantial factor in
- 5 causing Plaintiffs' harm.

6 ii. Elements of the Claim – *Defendant*:

- 7 1. There was an agreement between Plaintiffs and Defendant
- 8 for the sale of the products, or Plaintiffs were third party
- 9 beneficiaries of a valid contract between Defendant and an
- 10 authorized retailer of the products;
- 11 2. Plaintiffs purchased the products for personal, family, or
- 12 household purposes;
- 13 3. The products contained a material defect that Defendant
- 14 had exclusive knowledge of at the time of sale, and was
- 15 not known to Plaintiffs, nor was such knowledge
- 16 reasonably accessible to Plaintiffs;
- 17 4. Defendant intentionally did not disclose the material
- 18 defect to Plaintiffs or the members of the class before they
- 19 purchased the products;
- 20 5. To be material, the defect must have manifested during the
- 21 limited warranty time period and a reasonable consumer
- 22 would deem the omitted information important in
- 23 determining how to act in the transaction at issue;
- 24 6. The Defendant's omission was likely to deceive a
- 25 significant portion of the general consuming public;
- 26 7. Plaintiffs were damaged;
- 27 8. Plaintiffs' damages were caused as a direct and proximate
- 28 result of Defendant's omission.

iii. Damages – *Plaintiffs*: Plaintiffs seek damages correlating to the cost of the repair of the product.

- iv. **Damages – Defendant:** Sony denies that Plaintiffs are entitled to damages because they will not prevail on this claim and further denies that Plaintiffs can establish actual damages under the statute, which is defined as those which compensate someone for the harm from which he or she has been proven to currently suffer or from which the evidence shows he or she is certain to suffer in the future. Cal. Civ. Code § 1780(a)(1).

v. Defenses: Sony reserves its right to assert that Plaintiffs have failed to state a claim, lack standing (including, but not limited to, the ground the Plaintiffs did not purchase the SZ, FZ, EB, and F series), and the sufficiency of the class definition and class certification. Sony also asserts the following affirmative defenses:

1. Laches
 2. Unclean Hands
 3. Estoppel
 4. Waiver
 5. Justification
 6. No Quasi-Contractual Remedy
 7. Contract (provides for and authorizes the actions complained of)
 8. Statute of Limitations
 9. Failure to Mitigate
 10. Fault of Others

b. Violation of New Jersey's Consumer Fraud Act (Second Amended Complaint; Second Amended Complaint ¶¶153-166)

1 i. Elements of the Claim – *Plaintiffs*:

- 2 1. Defendant left out or did not mention an important or
3 significant fact about the class products;
4 2. Defendant intended Plaintiffs would rely on that
5 omission(s) in connection with the purchase of a class
6 laptop; and
7 3. As a result of Defendant's conduct, Plaintiffs did not get
8 the full value of the class laptops.

9 ii. Elements of the Claim – *Defendant*:

- 10 1. Defendant knowingly concealed or omitted an important
11 or significant fact regarding the products;
12 2. Defendant did so purposefully, or with the intent that
13 others would rely on that concealment or omission;
14 3. Defendant's action were performed in connection with
15 either the sale or advertisement of its products;
16 4. Defendant had a duty to disclose this information;
17 5. Plaintiffs suffered an ascertainable loss of money or
18 property, real or personal, as a result of Defendant's
19 omission;
20 6. There was a proximate, causal relationship between
21 Defendant's omission and Plaintiff's ascertainable loss.

22 iii. Damages – *Plaintiffs*: Plaintiffs seek damages in the amount of
23 the value of the repair of the defect and treble damages.

24 iv. Damages – *Defendant*: Sony denies that Plaintiffs are entitled to
25 damages because they will not prevail on this claim and further
26 denies that Plaintiffs can establish ascertainable damages under
27 the statute, which is defined as a type of damage that is
28 quantifiable or measureable that Plaintiffs already experienced

1 or a future out of pocket expense that Plaintiffs will be required
2 to make.

3 v. Defenses: Same as paragraph 2.a.v. above.

4 **c. Violation of Magnuson-Moss Warranty Act (15 U.S.C. § 2301;**

5 **Second Amended Complaint ¶¶101-111)**

6 i. Elements of the Claim – *Plaintiffs*:

- 7 1. Plaintiffs bought one of the class products manufactured
8 by Defendant;
- 9 2. Defendant's products did not perform as promised or
10 intended because the products could not be used as
11 portable devices;
- 12 3. Plaintiffs were harmed; and
- 13 4. The failure of Defendant's products to be as represented
14 was a substantial factor in causing Plaintiffs' harm.

15 ii. Elements of the Claim – *Defendant*:

- 16 1. Plaintiffs bought the products from Defendant or an
17 authorized retailer of Defendant's products;
- 18 2. Plaintiffs sought to acquire by purchase the products for
19 personal, family, or household purposes;
- 20 3. At the time of purchase Defendant was in the business of
21 selling the products;
- 22 4. The products were not of the same quality generally
23 acceptable in the trade or were not fit for the ordinary
24 purposes for which such goods are used;
- 25 5. Plaintiffs took reasonable steps to notify Defendant within
26 a reasonable time that the products did not have the
27 expected quality;

6. Plaintiffs and the class were harmed by this breach in an amount exceeding \$50,000.00 and no individual claim is less than \$25; and
 7. The failure of the products to have the expected quality was a substantial factor in causing Plaintiffs' harm.

iii. Damages – *Plaintiffs*: Plaintiffs seek damages correlating to the value of the repair of the laptop.

iv. Damages – *Defendant*: Sony denies that Plaintiffs are entitled to damages because they will not prevail on this claim and further denies that Plaintiffs can establish the proper measure of damages for this claim – difference at the time and place of acceptance of the products between the value of the products accepted and the value the products would have had if they had been as warranted, unless special circumstances show proximate damages of a different amount.

v. Defenses: Same as paragraph 2.a.v. above.

d. Breach of Implied Warranty of Merchantability (Cal. Civ. Code §§ 1791, et seq. “Song-Beverly Act”; Second Amended Complaint ¶¶ 138-148)

- i. Elements of the Claim – *Plaintiffs*:
 - 1. Plaintiffs bought one of the class products manufactured by Defendant;
 - 2. At the time of Plaintiffs' purchase, Defendant Sony was in the business of selling the class products to retailers;
 - 3. The class products did not fit the ordinary purpose for which they are used; and
 - 4. Plaintiffs were harmed
 - ii. Elements of the Claim – *Defendant*:

- 1 1. Plaintiffs bought the products from Defendant or an
2 authorized retailer of Defendant's products;
- 3 2. At the time of purchase Defendant was in the business of
4 selling the products;
- 5 3. The products were not of the same quality generally
6 acceptable in the trade or were not fit for the ordinary
7 purposes for which such goods are used;
- 8 4. Plaintiffs took reasonable steps to notify Defendant within
9 a reasonable time that the products did not have the
10 expected quality;
- 11 5. Plaintiffs were harmed; and
- 12 6. The failure of the products to have the expected quality
13 was a substantial factor in causing Plaintiffs' harm.

- 14 iii. Damages – *Plaintiffs*: Plaintiffs seek damages correlating to the
15 value of the repair of the laptop.
- 16 iv. Damages – *Defendant*: Sony denies that Plaintiffs are entitled to
17 damages because they will not prevail on this claim and further
18 denies that Plaintiffs can establish the appropriate measure of
19 damages for this claim – difference at the time and place of
20 acceptance of the products between the value of the products
21 accepted and the value the products would have had if they had
22 been as warranted, unless special circumstances show proximate
23 damages of a different amount.
- 24 v. Defenses: Same as paragraph 2.a.v. above.

25 e. **Violation of the Unfair Competition Law (Cal. Bus. & Prof. Code**
26 **§ 17200, et seq.; Second Amended Complaint ¶¶90-100)**

- 27 i. Elements of the Claim – *Plaintiffs*:

- 28 1. Plaintiffs purchased Defendant's product; and

- 1 2. Defendant provided information in a manner that is likely
- 2 to mislead or deceive the consumer; and
- 3 3. Defendant engaged in a business conduct that was unfair
- 4 by *either* violating an applicable law *or* violating the
- 5 public policy or spirit of the unfair business competition
- 6 law; and
- 7 4. Plaintiffs suffered injury by purchasing products they
- 8 would not have purchased but for the false or misleading
- 9 advertising.

10 ii. Elements of the Claim – *Defendant*:

- 11 1. Plaintiffs purchased defendant's product; and
- 12 2. Defendant engaged in an unlawful or unfair business act
- 13 or practice;
 - 14 a. Deceptive prong – Defendant's conduct was likely
 - 15 to deceive a significant portion of the general
 - 16 consuming public acting reasonably
 - 17 b. Unlawful prong – Defendant's practice was
 - 18 unlawful because it violated California's Consumer
 - 19 Legal Remedies Act, Magnuson-Moss Warranty
 - 20 Act or Implied Warranty of Merchantability; or
 - 21 c. The practice was unfair because the utility of the
 - 22 Defendant's conduct was outweighed by the gravity
 - 23 of the harm to the Plaintiffs;
- 24 3. Plaintiffs suffered an economic injury; and
- 25 4. Plaintiffs' economic injury was directly and proximately
- 26 caused by Defendant's unfair or unlawful business act or
- 27 practice.

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iii. Damages – *Plaintiffs*: Plaintiffs seek a restitution award of the profits earned by Defendant as a result of its violation of UCL.

- iv. **Damages – Defendant:** Sony denies that Plaintiffs are entitled to damages because they will not prevail on this claim and further denies that Plaintiffs can establish the appropriate measure of damages for this claim – restitution, defined as profits unfairly obtained to the extent that these profits represent monies given to the defendant or benefits in which the plaintiff has an ownership interest

v. Defenses: Same as paragraph 2.a.v. above.

3. Witnesses

a. Plaintiffs intend to call the following witnesses:

Percipient Witnesses

- i. Christina Egner: Ms. Egner is a class representative and plaintiff who will testify about her experience in purchasing the product, the problems she had with the product as well as the damages she suffered as a class representative.

ii. Rickey Glasco: Mr. Glasco is a class representative and plaintiff who will testify about his experience in purchasing the product, the problems he had with the product as well as the damages he suffered as a class representative.

iii. Jason Bonfig: Mr. Bonfig is a Best Buy employee, serving as the Vice President of Computing, who was designated by Best Buy to discuss his knowledge of the purchase and sales of the class products.

iv. William H. Fidoe: Mr. Fidoe was a Best Buy employee, who was the Deputy Director of Counter Intelligence, who has

1 knowledge of the repairs and warranty claims for the class
2 products.

- 3 v. Johnny Lincoln: Mr. Lincoln filed a similar claim against Sony
4 in a different district and is a percipient witness of the issues he
5 had with the class product and his experience.

6 **DEFENDANTS POSITION RE JOHNNY LINCOLN:**

7 Sony objects and will seek to exclude Mr. Lincoln on various
8 grounds, including: (1) Plaintiffs failed to disclose him in their
9 initial disclosures, any supplement their two, or otherwise during
10 the pre-class certification or post-class certification discovery
11 periods; (2) his testimony is irrelevant and should be excluded
12 under Rule 403 of the Federal Rules of Evidence, because,
13 among other reasons, he alleged in the case he filed in the C.D.
14 Cal. that the alleged defect manifested after the expiration of one-
15 year limited warranty (whereas here the Plaintiffs allege in-
16 warranty manifestation) and he voluntarily dismissed his
17 complaint on November 3, 2009 after the filing of Sony's motion
18 to dismiss on that basis, among others.

- 19 vi. Xiaopeng Liu: Former Senior Quality Engineer/Supplier Quality
20 Engineer with Sony, responsible for quality control.
- 21 vii. Barbara J. Matul: Ms. Matul was a Best Buy employee who was
22 a manager for the "Geek Squad" responsible for repairing class
23 laptops and has information about the defects at issue.
- 24 viii. Steven Nickel: Sony employee, designated by Sony to discuss
25 design, testing, manufacturing and repairing the class laptops,
26 including warranty claims and customer complaints, as well as
27 units of class laptops sold.

- 1 ix. Nathan D. Omann: Mr. Omann is a Best Buy employee, serving
2 as the Senior Manager of Sales and Services, who has knowledge
3 of the returns and services of class products.
- 4 x. Kannan Raj: Sony engineering employee who has information
5 about the defect at issue in the product and Sony's response to
6 the defect
- 7 xi. Cory Southern: Mr. Southern is a Sony employee who was the
8 Product Safety Analyst relating to the class products.
- 9 xii. Robert J. Stangler: Mr. Stanlger was a Best Buy employee who
10 has information about the warranty and repair records or service
11 records relating to the class laptops.

12 **Expert Witnesses**

- 13 i. Glenn Akhavein: Mr. Akhavein is a professional engineer
14 specializing in product design and development. Mr. Akhavein
15 will discuss the design, structure and composition of the class
16 laptops; the design failures and the effect of the defect on the
17 class laptops.
 - 18 ii. Michael D. Osterman, Ph.D. Dr. Osterman will discuss the
19 whiskering defect and how it is similar in each of the class
20 products.
 - 21 iii. Dr. Andrew J. Perry PE: Dr. Perry is the useful life expert who
22 will opine about the useful life of the class laptops.
 - 23 iv. Heather H. Xitco: Ms. Xitco is Plaintiffs' damages expert who
24 will testify about the damages and restitution requested.
- 25 i. Craig D. Hillman: Plaintiffs will address with Sony's expert,
26 Mr. Hillman, his testing of the class laptops and his conclusions
27 based on his testing.

- 28 b. Defendant's Witnesses:

1 **Fact Witnesses Sony Expects To Call**

- 2 i. Tim McGowan: – Mr. McGowan is Vice President, North
3 America Consumer service for Sony Electronics Inc. Mr.
4 McGowan is expected to testify about all aspects of Sony's
5 marketing, sale, and servicing of the VAIO notebooks at issue,
6 including, but not limited to, design and manufacture, sales and
7 service, series differences, express written limited warranty, lack
8 of alleged defect, lack of knowledge regarding alleged defect,
9 sales and repair numbers and rates, product development and
10 reliability, continuing engineering and service for series in the
11 field, Sony's standing on quality and repairs versus its
12 competitors.
- 13 ii. Chris Russo: Mr. Russo was formerly a Director in the Business
14 Planning Department and before that Director and Senior
15 Engineering Manager, Product Development & Hardware
16 Product Quality (VAIO) for Sony Electronic Inc. Mr. Russo is
17 expected to testify about (1) Sony's troubleshooting and
18 identification of potential issues relating to the Sony VAIO
19 computers at issue, (2) touchpad component and replacement
20 parts quality and processes, including ordering, returns,
21 remuneration, and interactions with suppliers, (3) lack of
22 potential whiskering issue affecting the SZ or FZ series; (4)
23 product development and quality; (5) product marketing; and (6)
24 the meaning of certain of Plaintiffs' exhibits.
- 25 iii. Paul Stewart: Mr. Stewart formerly served as Market Quality
26 Manager (VAIO) for Sony Electronics Inc. Mr. Stewart is
27 expected to testify about all aspects of Sony's service operation,
28 including, but not limited to: (1) named Plaintiffs and Johnny

1 Lincoln's repair records (if he is not excluded); (2) Sony's
2 customer and warranty service and records regarding same, (3)
3 Sony's troubleshooting resources, knowledge base articles, and
4 customer outreach; (4) Sony's Technical News and Service
5 Bulletins, (5) lack of defect; (6) lack of knowledge of defect; (7)
6 Sony's investigation into service issues, the tin-whiskering
7 phenomenon, and service solutions resulting from investigations.

8 **Expert Witnesses Sony Expects To Call**

- 9 i. Jack E. Gold: Mr. Gold is an expert who is expected to testify
10 about the useful life of the Sony VAIO notebook computers at
11 issue, including testifying in rebuttal plaintiffs' useful-life
12 expert, Dr. Andrew Perry.
- 13 ii. Craig D. Hillman, Ph.D.: Dr. Hillman is an expert who is
14 expected to testify about (1) differences with respect to the
15 touchpad components across the five series at issue, (2) use of
16 tin-plating and the tin-whiskering phenomenon, (3) his
17 examination of Plaintiffs' VAIO notebook computers, and (4)
18 lack of defect. He will also testify in rebuttal to plaintiffs'
19 experts, Glenn Akhavein and Dr. Michael Osterman.
- 20 iii. James E. Vaughn: Mr. Vaughn is an expert who is expected to
21 testify about software-related issues that may affect touchpad
22 performance for the Sony VAIO notebook computers at issue
23 generally and specifically as to Plaintiffs' VAIO notebooks as a
24 result of his examination of Plaintiffs' computers.
- 25 iv. Robert H. Wallace: Mr. Wallace is an expert who is expected to
26 testify on the proper measure of damages should plaintiffs'
27 prevail on their claims, including testifying in rebuttal to
28 Plaintiffs' damages expert, Heather Xitco.

1 **Additional Fact or Expert Witnesses Sony May Call**

- 2 i. Xiaopeng (Sean) Liu: Mr. Liu is a former Senior Quality
3 Engineer with Sony Electronics Inc. If called, he is expected to
4 testify regarding touchpad component quality and interactions
5 vendors or supplies involved in manufacturing, design, or
6 assembly, as well as the meaning of certain of Plaintiffs' exhibits.
- 7 ii. Steven Nickel: Mr. Nickel is a former Vice President, Product
8 Marketing for VAIO. If called, he is expected to testify about
9 the lack of defect, and service of and marketing specifications for
10 VAIO notebook computers, as well as the meaning of certain of
11 Plaintiffs' exhibits.
- 12 iii. Kannan Raj: Mr. Raj is a former Senior Manager, Hardware
13 Product Quality for Sony Electronics Inc. If called, he is expected
14 to testify about touchpad component parts quality, as well as the
15 meaning of certain of Plaintiffs' exhibits.
- 16 iv. Cory Southern: Mr. Southern is a former Product Safety Analyst
17 and Escalations Engineer (VAIO) for Sony Electronics Inc. If
18 called, he is expected to testify about service escalations for the
19 VAIO notebook computers at issue, as well as the meaning of
20 certain of Plaintiffs' exhibits.
- 21 v. Christina Egner: Ms. Egner is one of the named plaintiffs and
22 class representatives. Sony may call her to testify about her
23 experiences using her VAIO notebook and touchpad, her
24 continued use of her notebook over a period of multiple years
25 despite the claimed touchpad issues, and her rejection of a
26 replacement notebook under the terms of Sony's express limited
27 warranty.

- 1 vi. Rickey Glasco: Mr. Glasco is one of the named plaintiffs and
2 class representatives. Sony may call him to testify about his
3 experiences using his VAIO notebook and touchpad, his
4 continued use of his notebook despite the claimed touchpad
5 issues, and his failure to seek repair of the touchpad from Sony
6 or otherwise.
- 7 vii. Michael Osterman, Ph.D.: Dr. Osterman is plaintiffs' tin
8 whiskering expert. Sony may call him to testify about the lack
9 of scientific understanding about the tin whisker phenomenon,
10 range of potential consumer experiences if tin whiskers were to
11 develop, and inability to predict if, when, where, and how tin
12 whiskers may develop.
- 13 viii. Jason J. Bonfig: Mr. Bonfig was a Best Buy employee deposed
14 in this case who may be called to testify about the lack of any
15 significant issues with the Sony VAIO notebooks or touchpads
16 at issue.
- 17 ix. William H. Fidoe: Mr. Fidoe was a Best Buy employee deposed
18 in this case who may be called to testify about the lack of any
19 significant issues with the Sony VAIO notebooks or touchpads
20 at issue.
- 21 x. Barbara J. Matul: Ms. Matul was a Best Buy employee deposed
22 in this case who may be called to testify about the lack of any
23 significant issues with the Sony VAIO notebooks or touchpads
24 at issue.
- 25 xi. Nathan D. Omann: Mr. Omann was a Best Buy employee
26 deposed in this case who may be called to testify about the lack
27 of any significant issues with the Sony VAIO notebooks or
28 touchpads at issue, as well as Best Buy's repair/return policies,

including plaintiff Egner's failure to return her VAIO computer to Best Buy for repair under the terms of the service plan she purchased from Best Buy.

xii. Robert J. Stangler: Mr. Stangler was a Best Buy employee deposed in this case who may be called to testify about the lack of any significant issues with the Sony VAIO notebooks or touchpads at issue.

4. Exhibits

- a. Plaintiffs intend to present at trial the exhibits attached hereto as Exhibit A.
 - b. Defendant intends to present at trial the exhibits attached hereto as Exhibit B.

5. Pursuant to Civ. L.R. 16.1.f.6.c.5, the list of facts to which the parties hereby stipulate to and thus require no proof is attached hereto as Exhibit C.

6. The following deposition transcripts (by page and line) or videotape deposition (by section) that will be offered at trial:

- a. Plaintiffs
 - i. Jason Bonfig
 - ii. William H. Fidoe
 - iii. Barbara J. Matul
 - iv. Nathan D. Omann
 - v. Robert J. Stangler

- b. Defendant
 - i. Christina Egner
 - ii. Rickey Glasco

- 1 iii. Glenn Akhavein
- 2 iv. Michael Osterman, Ph.D.
- 3 v. Jason Bonfig:
- 4 vi. William H. Fidoe:
- 5 vii. Barbara J. Matul:
- 6 viii. Nathan D. Omann

7 The deadline for filing designations, counter designations and objections was not
8 specified by the Court, therefore the parties have met and conferred and agreed to the
9 following deadlines: Plaintiffs' designations will be served on August 8, 2016;
10 Defendant's designations and counter-designations will be served on August 19, 2016;
11 Plaintiffs' counter designations will be served on August 31, 2016, and both parties'
12 objections to all designations will be served on September 6, 2016. The parties will be
13 available to file the designations and objections at the time of the hearing on Motions
14 in Limine on September 7, 2016.

15
16 7. Joint proposed jury instructions will be submitted to the Court no later than
17 August 15, 2016, pursuant to the Court's Order. Doc. No. 333.

18
19 8. This case will be tried by a jury, in part, and the Court, in part as set forth
20 in paragraph 2 above.

21
22 9. The estimated time for trial is 8-10 court trial days. Trial time will be
23 limited to 20 hours for each side, including opening statements and closing arguments.

24 Dated: July 20, 2016


25 HON. CYNTHIA A. BASHANT
26 United States District Judge

27
28

EXHIBIT A

IN RE SONY VAIO COMPUTER NOTEBOOK TRACKPAD LITIGATION
Case No. 3:09-cv-02109-BAS-MDD

PLAINTIFFS' TRIAL EXHIBIT LIST

Plaintiffs expect to use the following exhibits:

No.	Date Marked	Date Admitted	Description
1.			Christina Egner Deposition Exhibit – Ex. 2: Best Buy receipt, Bates stamped EGNER000001
2.			Christina Egner Deposition Exhibit – Ex. 3: “Limited Warranty Statement,” Bates stamped SEL_0000337 and SEL_000038
3.			Christina Egner Deposition Exhibit – Ex. 4: SONY User Guide, Bates Stamped SEL_0016386-SEL_0016537
4.			Christina Egner Deposition Exhibit – Ex. 5: “Thank you for registering your Sony Product,” Bates stamped EGNER 000008
5.			Christina Egner Deposition Exhibit – Ex. 6: Sony Statement of Work, Invoice for repairs on 1/29/10; Bates stamped EGNER 000010
6.			Christina Egner Deposition Exhibit – Ex. 7: Sony Electronics, Inc. document, identifying work done on laptop computer; Bates stamped EGNER 000006
7.			Christina Egner Deposition Exhibit – Ex. 8: VAIO Notebook Repair Inventory Sheet, Bates stamped EGNER 000007
8.			Christina Egner Deposition Exhibit – Ex. 9: Sony Statement of Work, for repairs to computer laptop 2/19/10; Bates stamped EGNER 000011
9.			Christina Egner Deposition Exhibit – Ex. 10: Sony Electronics document, identifying work done on laptop; Bates stamped EGNER 000012

IN RE SONY VAIO COMPUTER NOTEBOOK TRACKPAD LITIGATION
Case No. 3:09-cv-02109-BAS-MDD

PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
10.			Christina Egner Deposition Exhibit – Ex. 11: Letter dated November 22, 2010 from Cooley to William Doyle demanding Egner respond to warranty offer
11.			Rickey Glasco Deposition Exhibit – Ex. 8: Fry's Electronics Invoice for purchase of laptop
12.			Rickey Glasco Deposition Exhibit – Ex. 9: Limited Warranty Statement
13.			R. Glenn Akhavein Deposition Exhibit – Ex. 2: Resume of Glenn Akhavein, Lead Consultant
14.			R. Glenn Akhavein Deposition Exhibit – Ex. 4: Sony VAIO Computer Laptop Touchpad Litigation Kevin Kennedy Associates Report No. 130114
15.			R. Glenn Akhavein Deposition Exhibit – Ex. 5: In re Sony VAIO Computer Notebook Trackpad Litigation Keven Kennedy Associates Report No. 130128
16.			R. Glenn Akhavein Deposition Exhibit – Ex. 6: Defendant Sony Electronic Inc.'s Second Supplemental Responses to Plaintiff Christina Egner's First Set of Interrogatories
17.			R. Glenn Akhavein Deposition Exhibit – Ex. 7: VAIO CR90 Summary, Market Quality/Service Engineering PowerPoint by Sony
18.			R. Glenn Akhavein Deposition Exhibit – Ex. 8: Sony internal communications about Sony component parts; Bates stamped SEL 0065406
19.			R. Glenn Akhavein Deposition Exhibit – Ex. 9: Email string, top email to Naoto

IN RE SONY VAIO COMPUTER NOTEBOOK TRACKPAD LITIGATION
Case No. 3:09-cv-02109-BAS-MDD

PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
			Chihara from Daisuke Koyama dated 3/5/08 discussing laptop defect and Sony's knowledge
20.			R. Glenn Akhavein Deposition Exhibit – Ex. 10: Service Bulletin No. NB08-003R2 with an updated date of 4/29/08
21.			R. Glenn Akhavein Deposition Exhibit – Ex. 11: Internal Sony document about laptop defect TP issue for US Market – Request help from JQT
22.			R. Glenn Akhavein Deposition Exhibit – Ex. 12: Sony's Technical News, No. V07E076, dated 10/25/07 about laptop defect
23.			R. Glenn Akhavein Deposition Exhibit – Ex. 13: Sony Technical News, No. V07E072, dated 10/16/07 about laptop defect
24.			R. Glenn Akhavein Deposition Exhibit – Ex. 14: Internal Sony document in 2006 discussing laptop touchpad; Bates stamped SEL 0065405
25.			R. Glenn Akhavein Deposition Exhibit – Ex. 15: Sony Service Bulletin No. NB10-059 dated 10/14/10
26.			R. Glenn Akhavein Deposition Exhibit – Ex. 16: Sony Service Bulletin No. NB10-059R1 with an update date of 12/27/10
27.			R. Glenn Akhavein Deposition Exhibit – Ex. 17: Sony Service Bulletin No. NB10-059R2 with an update date of 7/20/11
28.			R. Glenn Akhavein Deposition Exhibit – Ex. 18: Foxconn Pokerman T/P no function Issue Investigation and Improvement Report prepared by: EE

IN RE SONY VAIO COMPUTER NOTEBOOK TRACKPAD LITIGATION
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PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
			RD, 2010.07.26 discussing touchpad issue
29.			R. Glenn Akhavein Deposition Exhibit – Ex. 19: CV of R. Glenn Akhavein
30.			Jack E. Gold Deposition Exhibit – Ex. 3: CV of Jack Gold
31.			Jack E. Gold Deposition Exhibit – Ex. 4: Consultant Agreement
32.			Jack E. Gold Deposition Exhibit – Ex. 5: Invoice dated December 23, 2014
33.			Jack E. Gold Deposition Exhibit – Ex. 10: Press Release by J. Gold Associates
34.			Jack E. Gold Deposition Exhibit – Ex. 11: Article “404 Tech Support”
35.			Jack E. Gold Deposition Exhibit – Ex. 13: Sony emails about touchpad issue; Bates stamped SEL 0008389
36.			Michael Osterman, Ph.D. Deposition Exhibit – Ex. 12: Internal Sony Email, dated 8/25/2010, discussing touchpad issue and attachment SEL_0061573-86
37.			Michael Osterman, Ph.D. Deposition Exhibit – Ex. 13: Sony Service Bulletin, dated 10/14/10 (SEL_0006374-75)
38.			Michael Osterman, Ph.D. Deposition Exhibit – Ex. 14: Sony Service Bulletin, dated 10/14/10 (SEL_0052229-30)
39.			Michael Osterman, Ph.D. Deposition Exhibit – Ex. 15: “Sony Technical News,” dated October 14, 2010 (SEL_0004683-86)
40.			Michael Osterman, Ph.D. Deposition Exhibit – Ex. 16: “Foxconn Technical News,” dated 10/15/2010 (SEL_0038186-90)

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PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
41.			Andrew J. Perry Deposition Exhibit – Ex. 4: Invoice dated October 27, 2014
42.			Andrew J. Perry Deposition Exhibit – Ex. 5: Invoice dated November 18, 2014 and Invoice dated December 9, 2014
43.			Andrew J. Perry Deposition Exhibit – Ex. 6: “VGN-SZ Touchpad (Reversal/Opposite Direction) Proposal – 3 Year Limited Warranty,” dated November 11, 2008 (SEL_0003927-29)
44.			Andrew J. Perry Deposition Exhibit – Ex. 7: “Rebuttal Expert Report in Support of Defendant in re Sony VAIO Computer Notebook Trackpad Litigation”
45.			Heather H. Xitco Deposition Exhibit – Ex. 5: Defendant Sony Electronic Inc.’s Third Supplemental Responses to Plaintiff Christina Egner’s First Set of Interrogatories
46.			Heather H. Xitco Deposition Exhibit – Ex. 6: Defendant Sony Electronic Inc.’s First Supplemental Responses to Plaintiffs’ Second Set of Interrogatories Regarding Merits Discovery Nos. 5-7
47.			Heather H. Xitco Deposition Exhibit – Ex. 7: Defendant Sony Electronic Inc.’s Responses to Plaintiffs’ First Set of Special Interrogatories Regarding Merits Discovery
48.			Jason J. Bonfig Deposition Exhibit – Ex. 12: Spreadsheet identifying Sony laptops sold and retail price
49.			Jason J. Bonfig Deposition Exhibit – Ex. 14: Sony marketing sheets for Best Buy; Bates Number BBY000115-121

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PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
50.			Jason J. Bonfig Deposition Exhibit – Ex. 16: Log of customer issues with touchpad; Bates Number BBY000002
51.			Xiaopeng Liu Deposition Exhibit – Ex. 2: Email dated March 7, 2011, with attachment about presentation on touchpad issue; Bates Number SEL41845-55
52.			Xiaopeng Liu Deposition Exhibit – Ex. 3: Email string containing emails dated November 8, 2010 about touchpad issue; Bates Number SEL61659-61
53.			Xiaopeng Liu Deposition Exhibit – Ex. 4: Email string containing email dated August 25, 2010 about touchpad whiskering; Bates Number SEL41440-48
54.			Xiaopeng Liu Deposition Exhibit – Ex. 5: Email dated January 5, 2011 about quality of touchpad parts; Bates Number SEL57227-30
55.			Barbara J. Matul Deposition Exhibit – Ex. 24: Logs on complaints about touchpad; Bates No. BBY000001
56.			Steven Nickel Deposition Exhibit – Ex. 2: Organization Chart Manufacturing Operations
57.			Steven Nickel Deposition Exhibit – Ex. 3: Organization Chart Manufacturing and QC
58.			Steven Nickel Deposition Exhibit – Ex. 4: Organization Chart VOA Manufacturing – 1 st Shift
59.			Steven Nickel Deposition Exhibit – Ex. 5: Organization Chart VAIO Repair Operations

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PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
60.			Steven Nickel Deposition Exhibit – Ex. 6: Organization Chart Service Platform
61.			Steven Nickel Deposition Exhibit – Ex. 7: Organization Chart Quality & Improvement
62.			Steven Nickel Deposition Exhibit – Ex. 8: Organization CS/Product Quality and Factory Engineering
63.			Steven Nickel Deposition Exhibit – Ex. 9: Organization Chart CE Engineering
64.			Steven Nickel Deposition Exhibit – Ex. 10: Tech Support Engineering, Sr. Manager, Organization Chart
65.			Steven Nickel Deposition Exhibit – Ex. 11: Limited Warranty Statement
66.			Steven Nickel Deposition Exhibit – Ex. 12: VGN-SZ Touchpad, Proposal 3-Year Limited Warranty
67.			Steven Nickel Deposition Exhibit – Ex. 13: Email dated 12/1/2011 about touchpad “reversal”
68.			Steven Nickel Deposition Exhibit – Ex. 14: Email dated 9/21/2007 about touchpad defect
69.			Steven Nickel Deposition Exhibit – Ex. 15: Email dated 8/16/2008 timeline of touchpad replacements and manufacturing
70.			Steven Nickel Deposition Exhibit – Ex. 16: Email dated 2/20/2011 calculating sales vs. repairs of touchpad
71.			Steven Nickel Deposition Exhibit – Ex. 17: Email dated 1/5/2011 discussing touchpad problem

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PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
72.			Steven Nickel Deposition Exhibit – Ex. 18: Email dated 6/11/2008 with quality meeting PowerPoint about touchpad
73.			Steven Nickel Deposition Exhibit – Ex. 19: Email dated 6/29/2011 discussing repairs
74.			Steven Nickel Deposition Exhibit – Ex. 20: Event/Action Descriptions Excel File pages on touchpad issues
75.			Steven Nickel Deposition Exhibit – Ex. 21: Email dated 12/22/2011 with attachments discussing customer support on touchpad
76.			Steven Nickel Deposition Exhibit – Ex. 22: Email dated 8/15/2008 on customer complaints and calls about touchpad
77.			Steven Nickel Deposition Exhibit – Ex. 23: Email dated 8/16/2008 discussing touchpad defect
78.			Steven Nickel Deposition Exhibit – Ex. 24: Email chain from Steven Nickel to Eileen Karakas dated 8/16/2008 discussing touchpad “escalation”
79.			Steven Nickel Deposition Exhibit – Ex. 25: Email dated 8/20/2008 discussing touchpad issue
80.			Steven Nickel Deposition Exhibit – Ex. 26: Email chain dated 8/22/2008 discussing solution for touchpad issue
81.			Steven Nickel Deposition Exhibit – Ex. 27: Email chain dated 9/26/2008 regarding touchpad defect
82.			Steven Nickel Deposition Exhibit – Ex. 28: Email dated 9/3/2008 regarding touchpad defect

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No.	Date Marked	Date Admitted	Description
83.			Steven Nickel Deposition Exhibit – Ex. 29: Top 10 Opportunity Topics & Series, Spring 2011 showing touchpad issues
84.			Steven Nickel Deposition Exhibit – Ex. 30: Email dated 2/26/2010 providing touchpad metrics
85.			Steven Nickel Deposition Exhibit – Ex. 31: Organizational Chart – Manufacturing Operations
86.			Steven Nickel Deposition Exhibit – Ex. 32: Email dated 12/14/2006 with scale of touchpad issues
87.			Steven Nickel Deposition Exhibit – Ex. 33: Email dated 12/21/2011 with “Failure Analysis Report”
88.			Nathan D. Omann Deposition Exhibit – Ex. 5: discussing return rate for touchpads; Bates Number BBY000097-100
89.			Nathan D. Omann Deposition Exhibit – Ex. 6: discussing repairs on Sony touchpad; Bates Number BBY000122-125
90.			Nathan D. Omann Deposition Exhibit – Ex. 8: Defendant Best Buy Stores, L.P.’s Responses to Interrogatories
91.			
92.			Kannan Raj Deposition Exhibit – Ex. 2: VAIO and Mobile of America Hardware Product Quality Organization Chart, Bates Number SEL 0057075
93.			Kannan Raj Deposition Exhibit – Ex. 3: Email from Naoto Chihara to Fed Iravani and others, dated 9/20/2007, Bates Number 0011775-76

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PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
94.			Kannan Raj Deposition Exhibit – Ex. 4: Service Bulletin, dated December 21, 2007, Bates Number 0052213-15
95.			Kannan Raj Deposition Exhibit – Ex. 5: Email chain, Bates Number 0047104-07
96.			Kannan Raj Deposition Exhibit – Ex. 6: Service Bulletin, dated February 25, 2008
97.			Kannan Raj Deposition Exhibit – Ex. 7: Email about touchpad issue and Sony knowledge from Koyama Daisuke to Naoto Chihara dated March 5, 2008, Bates Number 0020077
98.			Kannan Raj Deposition Exhibit – Ex. 8: Sony Technical News, dated May 20, 2008
99.			Kannan Raj Deposition Exhibit – Ex. 9: Sony Technical News, dated June 9, 2008
100.			Kannan Raj Deposition Exhibit – Ex. 10: VGN-SZ Touchpad (Reversal/Opposite Direction) Proposal 3 Year Limited Warranty, dated November 11, 2008, Bates Number 003927-29
101.			Kannan Raj Deposition Exhibit – Ex. 11: Email from Eileen Karakas to Steven Nickel and others dated August 16, 2008 about customers experiencing touchpad issue
102.			Kannan Raj Deposition Exhibit – Ex. 12: Email from David Merski to Terry Ardingen and Paul Stewart, Bates Number 009310-13, dated September 30, 2009 with PowerPoint on touchpad issue
103.			Kannan Raj Deposition Exhibit – Ex. 13: Service Bulletin dated April 29, 2008

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PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
			with an updated September 9, 2008, issued by Kaz Ishibashi
104.			Kannan Raj Deposition Exhibit – Ex. 14: Email from Safety to various people, dated September 23, 2008, Bates Number 0069541
105.			Kannan Raj Deposition Exhibit – Ex. 15: Defect ID 169 Project VAIO Service Escalation documents on internal communication about touchpad
106.			Kannan Raj Deposition Exhibit – Ex. 16: Pokerman T/P No Function Issue Investigation and Improvement Report, Dated July 26, 2010, Bates Number 008122-31
107.			Kannan Raj Deposition Exhibit – Ex. 17: Email chain about Foxconn stopping shipment because touchpad not working
108.			Kannan Raj Deposition Exhibit – Ex. 18: Email chain, dated August 9, 2010, Bates Number 0041362-63 about Foxconn
109.			Kannan Raj Deposition Exhibit – Ex. 20: Email chain about Foxconn and whiskering
110.			Kannan Raj Deposition Exhibit – Ex. 21: Email chain about touchpad test
111.			Kannan Raj Deposition Exhibit – Ex. 23: Email from Xiaopeng Liu to Kannan Raj, Bates Number 004134-41
112.			Kannan Raj Deposition Exhibit – Ex. 24: Defect ID Number 414 VAIO Service Escalation document relating to touchpad
113.			Kannan Raj Deposition Exhibit – Ex. 25: Email from Kanna Raj to San Diego VAIO SQA and others dated August 25,

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PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
			2010 about whiskering; Bates Number 0054460-73
114.			Kannan Raj Deposition Exhibit – Ex. 27: Email chain about high problem and defect, Bates Number 0054333-35
115.			Kannan Raj Deposition Exhibit – Ex. 28: Email chain to use current defective part on touchpad, Bates Number 0006376-78
116.			Kannan Raj Deposition Exhibit – Ex. 29: Email from Mr. Ogata to Kannan Raj and others, dated November 8, 2010 discussing replacing parts
117.			Kannan Raj Deposition Exhibit – Ex. 30: Email chain about getting “good parts” when available, Bates SEL 0057148-50
118.			Kannan Raj Deposition Exhibit – Ex. 31: Email chain stating “not to forward email,” Bates Number 0041572-74
119.			Kannan Raj Deposition Exhibit – Ex. 33: Email from Kannan Raj to Daisuke Koyama, dated November 8, 2010 about potential repair, Bates Number 0057163-66
120.			Kannan Raj Deposition Exhibit – Ex. 34: VAIO Service Engineering/Market Quality addressing whiskering, dated April 2011
121.			Kannan Raj Deposition Exhibit – Ex. 35: Email from Kannan Raj to Mr. Ogata about Foxconn potential repair, Bates Number 0041521-23
122.			Kannan Raj Deposition Exhibit – Ex. 36: Email from Kannan Raj to Christopher Russo, dated January 31, 2011 with PowerPoint slides on whiskering, Bates Number 0057241-45

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PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
123.			Kannan Raj Deposition Exhibit – Ex. 37: Email from David Laguna to Kannan Raj with PowerPoint slides on defect, dated April 28, 2010
124.			Kannan Raj Deposition Exhibit – Ex. 38: Email from David Laguna to various people with PowerPoint slide on “touchpad issue,” dated February 2, 2010
125.			Kannan Raj Deposition Exhibit – Ex. 39: PowerPoint, New Models Report Fall 09 Field Issues (3/10/09), Bates Number 0041225-29
126.			Kannan Raj Deposition Exhibit – Ex. 40: PowerPoint, Production Issue May Have Some Impact in the Field, Bates Number 0052247-55
127.			Kannan Raj Deposition Exhibit – Ex. 41: Email from Kannan Raj to SD-VAIO-SQA dated August 25, 2010 with attachment about whiskering issues, Bates Number 0061573-86
128.			Cory Southern Deposition Exhibit – Ex. 2: Organizational Chart, Bates SEL_00016898 and SEL_0001721
129.			Cory Southern Deposition Exhibit – Ex. 3: Email dated August 22, 2007 about “cursor moving,” Bates SEL_00061223
130.			Cory Southern Deposition Exhibit – Ex. 4: Email from Naoto Chihara dated September 20, 2007 “cursor moving,” Bates SEL_0011775-76
131.			Cory Southern Deposition Exhibit – Ex. 5: Service Bulletin, dated December 21, 2007, Bates SEL_0052213-15

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No.	Date Marked	Date Admitted	Description
132.			Cory Southern Deposition Exhibit – Ex. 6: April 2008 email exchange discussing service bulletin, Bates SEL_0047104-07
133.			Cory Southern Deposition Exhibit – Ex. 7: Email dated March 5, 2008 “aware of ‘touchpad’ situation,” Bates SEL_00220077
134.			Cory Southern Deposition Exhibit – Ex. 8: Sony Service Bulletin dated February 25, 2008, Bates SEL_0000409
135.			Cory Southern Deposition Exhibit – Ex. 9: Technical News Bulletin, dated May 20, 2008, Bates SEL_0000405-06
136.			Cory Southern Deposition Exhibit – Ex. 10: Sony Technical News Bulletin, dated June 9, 2008, Bates SEL_0000407-08
137.			Cory Southern Deposition Exhibit – Ex. 11: Service Bulletin, updated September 9, 2008
138.			Cory Southern Deposition Exhibit – Ex. 12: PowerPoint “VGN_SZ Touchpad (Reversal/Opposite Direction), dated November 11, 2008, Bates SEL_0003927-29
139.			Cory Southern Deposition Exhibit – Ex. 13: New Models Report – Fall 09 Field Issues, dated March 10, 2009, Bates SEL_0041225-29
140.			Cory Southern Deposition Exhibit – Ex. 14: Email dated December 18, 2009 about customer issue with touchpad, Bates SEL_0035566-67
141.			Cory Southern Deposition Exhibit – Ex. 15: Email dated December 19, 2009 potential service of touchpad, Bates SEL_0035569-70

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PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
142.			Cory Southern Deposition Exhibit – Ex. 16: Email exchange about customer complaints, Bates SEL_0013764-65
143.			Cory Southern Deposition Exhibit – Ex. 17: Email exchange dated January 15, 2010 about reported problems with touchpad, Bates SEL_0041095-96
144.			Cory Southern Deposition Exhibit – Ex. 18: Email exchange about failures, Bates SEL_0017505
145.			Cory Southern Deposition Exhibit – Ex. 21: September 21, 2010 Service Bulletin, Bates SEL_0004085-86
146.			Cory Southern Deposition Exhibit – Ex. 22: October 14, 2010 Service Bulletin, Bates SEL_0000412-13
147.			Cory Southern Deposition Exhibit – Ex. 23: October 14, 2010 Service Bulletin updated July 20, 2011, Bates SEL_0004087-88
148.			Cory Southern Deposition Exhibit – Ex. 24: Service Escalation document
149.			Cory Southern Deposition Exhibit – Ex. 25: Email exchange “use current parts until new ones available,” Bates SEL_0006376-78
150.			Cory Southern Deposition Exhibit – Ex. 26: PowerPoint “VGN-NWxx Series VESCA Escalations,” Bates SEL_0019532
151.			Cory Southern Deposition Exhibit – Ex. 27: October 14, 2010, Service Bulletin, updated December 27, 2010, Bates SEL_0002120-21
152.			Cory Southern Deposition Exhibit – Ex. 28: Email from Rene Abraham Tijerina,

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PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
			dated December 28, 2010, with attachment about returns because of problems, Bates SEL_0010985-86
153.			Cory Southern Deposition Exhibit – Ex. 29: Email exchange dated January 21, 2011 about ability to fix touchpad, Bates SEL_0039395-98
154.			Cory Southern Deposition Exhibit – Ex. 32: VOA Report on “improved part”
155.			Cory Southern Deposition Exhibit – Ex. 33: Sony service Bulletin, dated February 25, 2011, Bates SEL_0004089-90
156.			Cory Southern Deposition Exhibit – Ex. 34: Email from Raj Kanna, dated March 6, 2011 about number of incidents with touchpad, Bates SEL_0011148
157.			Cory Southern Deposition Exhibit – Ex. 35: Email from David Laguna dated March 7, 2011, and presentation, Bates SEL_0041845-55
158.			Cory Southern Deposition Exhibit – Ex. 36: Email from Sonia Farace with attached about summit on touchpad, Bates SEL_0019052-80
159.			Cory Southern Deposition Exhibit – Ex. 38: Email exchange “touchpad whisker issue,” Bates SEL_0007191
160.			Cory Southern Deposition Exhibit – Ex. 39: Email from David Laguna dated February 4, 2010, and presentation on touchpad issues, Bates SEL_00111858-61
161.			Cory Southern Deposition Exhibit – Ex. 40: Email from David Laguna dated February 2, 2010, and presentation on touchpad issues, Bates SEL_0011862-65

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No.	Date Marked	Date Admitted	Description
162.			Cory Southern Deposition Exhibit – Ex. 41: Email exchange on “script” for touchpad issues, Bates SEL_0011057-59
163.			Cory Southern Deposition Exhibit – Ex. 42: VAIO Service Engineering/Market Quality April 2011 and March 2011, Bates SEL_0011685-86
164.			Cory Southern Deposition Exhibit – Ex. 43: Email exchange about failure and replacing with good parts, Bates SEL_0061659-61,
165.			Cory Southern Deposition Exhibit – Ex. 44: VOA Report dated October 22, 2010, and January 30, 2010
166.			Cory Southern Deposition Exhibit – Ex. 45: Email thread and 5C Report, Bates SEL_0041440-48
167.			Cory Southern Deposition Exhibit – Ex. 46: Pictures and diagrams of cleaning touchpad; Bates SEL_0041449-50
168.			Cory Southern Deposition Exhibit – Ex. 47: Email exchange dated August 6, 2010 touchpad not working “whisker suspicion,” Bates SEL_0046163-64
169.			Cory Southern Deposition Exhibit – Ex. 48: Email exchange “same whisker not cause,” Bates SEL_0041459-61
170.			Cory Southern Deposition Exhibit – Ex. 49: Email exchange about failure rate, Bates 0011439-40
171.			Craig Hillman, Ph.D. Deposition Exhibit – Ex. 4: Service Bulletin for the Sony VAIO VGN-SZ Series
172.			Craig Hillman, Ph.D. Deposition Exhibit – Ex. 5: Email Chain from Sony

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PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
			employees on reworking parts because of touchpad issue
173.			Craig Hillman, Ph.D. Deposition Exhibit – Ex. 6: Service Bulletin NB08-025R1
174.			Craig Hillman, Ph.D. Deposition Exhibit – Ex. 7: Sony Document “SZ Touchpad”
175.			Craig Hillman, Ph.D. Deposition Exhibit – Ex. 8: Email chain between Rainier and Daisuke about touchpad connectivity issue
176.			Craig Hillman, Ph.D. Deposition Exhibit – Ex. 9: DfR Solutions White Paper
177.			Craig Hillman, Ph.D. Deposition Exhibit – Ex. 10: “Rework SOP – FC China”
178.			Craig Hillman, Ph.D. Deposition Exhibit – Ex. 11: “EB T/P issue Series Comparison”
179.			Craig Hillman, Ph.D. Deposition Exhibit – Ex. 12: Japan Quality Team Report
180.			Plaintiff Egner production Egner_000001-000015, with receipt and data from Sony
181.			Glasco_000001-000002 receipt for purchase
182.			Video of hardware examination conducted on Plaintiff Egner’s computer on November 16, 2012, by Defendant Sony’s expert Dr. Craig Hillman [Confidential]
183.			Video of hardware examination conducted on Plaintiff Glasco’s computer on November 16, 2012, by Defendant Sony’s expert Dr. Craig Hillman [Confidential]

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PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
184.			Summary of Examination of Plaintiff Christina Egner's Laptop Computer [Confidential]
185.			SEL_0004631-4632 (Email from Ogata (VAIO) re parts quality issue, dated November 8, 2010) [Confidential]
186.			SEL_0038186-38190 (Foxconn Technical News re Touchpad may not work, Issue Dates October 15, 2010 and December 23, 2010) [Confidential – For Counsel Only]
187.			SEL_0041572-74 (Yip (Foxconn) email re TP issue) [Confidential – For Counsel Only]
188.			SEL_0048080-48083 (Sony Technical News re Touchpad may not work, Issue Dates October 14, 2010 and December 27, 2010) [Confidential – For Counsel Only]
189.			SEL_0052247-55 (Sony Production Issue – May have some impact in the field) [Confidential – For Counsel Only]
190.			SEL_0054460-54465 (Email from Kannan Raj re quality issue – whisker issue, dated August 25, 2010) [Confidential – For Counsel Only]
191.			SEL_0054599-54602 (Sony Technical News re Touchpad may not work, Issue Date October 14, 2010) [Confidential – For Counsel Only]
192.			SEL_0057241-57245 (Email from Kannan Raj with slides re whisker issue, dated January 31, 2011) [Confidential]
193.			SEL_0061573-61578 (Email Kannan Raj from re quality issue – whisker issue,

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No.	Date Marked	Date Admitted	Description
			dated August 25, 2010) [Confidential – For Counsel Only]
194.			SEL_0061659-62 (email from Ishibashi re parts quality issue, dated November 8, 2010) [Confidential – For Counsel Only]
195.			SEL_0064336-64341 (Service Bulletin re Touchpad may not work, Issue date October 14, 2010, Update: December 27, 2010) [Confidential – For Counsel Only]
196.			SEL_0065405 (VAIO Service Escalation Report, last update November 17, 2006 [Confidential – Four Counsel Only]
197.			SEL_0065406 (VAIO Service Escalation Report, last update November 1, 2008 [Confidential – Four Counsel Only]
198.			SEL_0065407 (VAIO Service Escalation Report, last update September 26, 2008 [Confidential – Four Counsel Only]
199.			SEL_0065408 (VAIO Service Escalation Report, last update October 17, 2008 [Confidential – Four Counsel Only]
200.			SEL_0065409 (VAIO Service Escalation Report, last update October 22, 2010 [Confidential – Four Counsel Only]
201.			SEL_0065410 (VAIO Service Escalation Report, last update October 22, 2010 [Confidential – Four Counsel Only]
202.			SEL_0008122-SEL_0008131 (Foxconn “Pokerman T/P no function Issue Investigation and Improvement Report”) [Confidential Pursuant to Protective Order]
203.			SEL_0054460-SEL_0054473 (internal Sony correspondence, report re: “Whisker issue,” and ALPS 5C report for ALPS

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No.	Date Marked	Date Admitted	Description
			Touchpad Whisker issue") [Confidential Pursuant to Protective Order]
204.			SEL_0064336-SEL_0064337; SEL_0064344- SEL_0064345; SEL_0064353-SEL_0064354; (Service Bulletins RE: Touchpad may not work) [Confidential Pursuant to Protective Order]
205.			Japanese Electronics and Information Technology Industries Association ("JEITA") member list, of which Sony is a Vice Chairman and Secretary; Whisker Test Methods of JEITA as of 2003
206.			Sony Technical Standards, 2004, finding whiskers are a "critical" issue on terminal (SEL_0033641-0033643, 0033645-0033646, 0033651, 033656) [Confidential Pursuant to Protective Order]
207.			Center for Advanced Life Cycle Engineering, 2 nd International Symposium on Tin Whiskers, April 24-25, 2008, with Sony presentation on "Whisker and Nodule Formation on Lead-Free Tin Plating by External Stress"
208.			SEL_0042187-SEL_0042195 ("VGN-SZ Touchpad Reversal") [Confidential Pursuant to Protective Order]
209.			SEL_0011775-SEL_0011776 (internal Sony email dated September 2010 RE: Regular bi-weekly engineering conference all discussing "Cursor moves in opposite direction of input command"); SEL_0020077 (internal Sony email RE: "Cursor moves in

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No.	Date Marked	Date Admitted	Description
			opposite direction issues happen on VGNSZ6xx”-“We have also been aware of the situation because we got the same report from Japan market”) [Confidential Pursuant to Protective Order]
210.			SEL_0013799 (Service Bulletin for SZ, No. NB08-003R1 RE: Cursor moves in opposite direction, DITS) [Confidential Pursuant to Protective Order]
211.			SEL_0047104-SEL_0047107 (internal Sony email defining code “DITS” as “(D-Design Defect, I-In House Rework, T-Touchpad/ Mouse, S-Service Bulletin”) [Confidential Pursuant to Protective Order]
212.			SEL_0063731-SEL_0063732 (internal Sony email regarding touchpad reversal problem becoming an “epidemic” issue) [Confidential Pursuant to Protective Order]
213.			SEL_00008389-SEL_00008390 (internal Sony email Re: secret warranty) [Confidential Pursuant to Protective Order]
214.			SEL_0050064 (internal Sony email to “stop” talking about VGN-SZ secret warranty) [Confidential Pursuant to Protective Order]
215.			SEL_0001178 (Sony’s “Gen-Y Marketing Lifestyle Oriented,” showing consumers using laptop: at the beach, on the dock at the water’s edge, on the grass, and at the skate park); SEL_0032504, SEL_0032510, SEL_0032511 (Advertisement headlines)

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No.	Date Marked	Date Admitted	Description
			[Confidential Pursuant to Protective Order]
216.			SEL_0057227-SEL_0057230 (internal Sony email correspondence regarding overlooking “huge problem in the field” because Sony identifying no problem found. [Confidential Pursuant to Protective Order])
217.			Rescuecom Computer Reliability Reports for 2010, 2011, 2012, and 2013
218.			SEL_SHERWOOD003-013 (Invoices) [Confidential Pursuant to Protective Order]
219.			SEL_0033096-SEL_0033102 (internal Sony email correspondence, dated February 2010 RE: NW touchpad-total results) [Confidential Pursuant to Protective Order]
220.			SEL_0073370; SEL_0073374; SEL_0073377; SEL_0073379; SEL_0073382; SEL_0073385 (stating Sony’s VPC-EB series have “Touchpad Problems” with “High failure%”) [Confidential Pursuant to Protective Order]
221.			“Pokerman Introduction” showing touchpad is a key design feature necessary for portability (SEL_0000525, 0000527, 0000532, 0000536; 0000540; 0000546; 000549); (Service Training Manual (SEL_0000616) [Confidential Pursuant to Protective Order]
222.			Best Buy repair and consumer complaint log (BBY0000002 STAR – BBY0000006)

IN RE SONY VAIO COMPUTER NOTEBOOK TRACKPAD LITIGATION
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PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
223.			Complaints about touchpad (SEL_0000414-79)
224.			Complaints and service orders regarding touchpad issues (SEL_0000483)
225.			Pokerman Introduction (1/14/09) [Confidential Pursuant to Protective Order] (SEL_0000525-616)
226.			Freedom Introduction, 9/7/2009 (SEL_0002424-54)
227.			Suzaku Model Overview, 9/7/2009 (SEL_0002455-70)
228.			Sony's service records for Christina Egner (SEL_0003174-90)
229.			Sony work orders regarding touchpad complaints (SEL_0004174; SEL_0004234; SEL_0004363; SEL_0004370; SEL_0004372; SEL_0004485; SEL_0004551; SEL_0005701; SEL_0005761; SEL_0005903; SEL_0007108; SEL_0007180; SEL_0007691)
230.			Internal Sony correspondence re NW "has many touch pad defect in market" (SEL_0011901-4)
231.			Sony Limited Warranty Statement (SZ, FZ, and NW) (SEL_0032450-51)
232.			Advertisement headlines/communications briefs (SEL_0032503-16)
233.			Internal Sony correspondence re Whisker issue of suspicion (SEL_0041836-88)
234.			Internal Sony correspondence RE: touchpad not work (SELE_0041435-38)
235.			Internal Sony correspondence Re "do not use this email or do not forward."

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No.	Date Marked	Date Admitted	Description
			[Confidential Pursuant to Protective Order] (SEL_0041567-74)
236.			Internal Sony correspondence re VPC-EB Service Escalation (SEL_0042918-21)
237.			Sony Limited Warranty Statement (SZ and FZ) (SEL_0064366-67)
238.			Sony Limited Warranty Statement (SZ, FZ and NW) (SEL_0064468-69)
239.			Sony Limited Warranty Statement (EB and F) (SEL_0064941-42)
240.			November 28, 2012 Deposition Transcript of Robert J. Stangler
241.			VAIO Seasonal Training – Summer 2009 PowerPoint (SEL_0000553-670)
242.			IRX-3980 Introduction: Summer 2007 Model Product Engineering Meeting (SEL_000112-1165)
243.			Pokerman Introduction NPC 1-2 Sakura Lio 2009.1.14 (SEL_0001445-69)
244.			Consumer Complaint Spreadsheet SEL_0001574_Confidential – For Counsel Only
245.			Consumer Complaint Spreadsheet SEL_0001575_Confidential – For Counsel Only
246.			Consumer Complaint Spreadsheet SEL_0001576_Confidential – For Counsel Only
247.			Consumer Complaint Spreadsheet SEL_0001577_Confidential – For Counsel Only
248.			Consumer Complaint Spreadsheet SEL_0001578_Confidential – For Counsel Only

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No.	Date Marked	Date Admitted	Description
249.			Consumer Complaint Spreadsheet SEL_0001579_Confidential – For Counsel Only
250.			IRX-3730 Introduction: Summer 2007 Model Engineering Product Meeting (SEL_0002350-83)
251.			Email from Christopher Graves to Sony_ADT re: 407956 / E40603024 – Debrief (SEL_0004144-45)
252.			Email from Christopher Graves to Sony_ADT re: 414951 / E40953586 – Debrief (SEL_0004213)
253.			Communication Brief Springs 2007 Product: VAIO SZ Notebook Computer – Standard Model: SZ430 (SEL_0032510-16)
254.			Messaging Document Fall 2009 Product: VAIO NW Notebook (SEL_0032525-27)
255.			Sony Technical News No.: V10E077R2 (SEL_0064355-58)
256.			Sony VAIO Web Blog Awareness 5.1.08 (SEL_0066529-33; SEL_0066537-42; SEL_0066549-50; SEL_0066553; SEL_0066559; SEL_0066567; SEL_0066569-71)
257.			Email from Steven Nickel to Paul Stewart re: SZ Touchpad, with attachment (SEL_0067734-45)
258.			Sony Technical Standards – Test Methods for Electronic Components, Lead-Free Soldering Parts Design Standards (SEL_0033641-56)
259.			
260.			Email from Steven Nickel to Naoto Chihara and Dean Richmond re: Problem

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No.	Date Marked	Date Admitted	Description
			with laptop, August 22, 2008 (SEL_0063731)
261.			Email from Terry Adinger to Michael Joaquin and Paul Stewart re: SZ touch pag, June 24, 2008 (SEL_0043977)
262.			Email from Eileen Karakas to Paul Stewart and Chad Kneeshaw re: TS Script – Sony WO: WK02194384-E44461643, February 26, 2010 (SEL_0033100)
263.			Email from Michael Joaquin to Terry Ardinger and Paul Stewar re SZ touch Pad, June 25, 2008 (SEL_0043976)
264.			Email from Timothy Huffman to Paul Stewart, Chad Kneeshaw and Eileen Karakas re: NW toughpad – total results, February 26, 2010 (SEL_0033098-99)
265.			Email from Chad Kneeshaw to Paul Stewart re: FW: TS Script – Son yWO: WK02212255 – E44503244 (NW TP issue), February 24, 2010 (SEL_0009780)
266.			Sony spreadsheet on customer complaints about touchpad issues; SEL_ID_0001-Highly Confidential – Atty Eyes Only
267.			Hardware report 4/29/2010 discussing sales of touchpads and quantity of repairs and refurbishing touchpads because of touchpad issue “FA09 & SP10 Market Component DPPM Hardware Report 4/29/10” (SEL_0011928-0011939)
268.			SEL_00073437 Sony Spreadsheet identifying part number, part description and moving average price

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PLAINTIFFS' TRIAL EXHIBIT LIST

Plaintiffs may use the following exhibits:

No.	Date Marked	Date Admitted	Description
269.			Christina Egner Deposition Exhibit – Ex. 1: “Etsy Transaction – Set of 4 Birthday Clothespin Magnets”
270.			Christina Egner Deposition Exhibit – Ex. 19: Fax From HSBC Merchant Operations to Renee Johnson with credit card application; Bates stamped BBY000008-9
271.			Christina Egner Deposition Exhibit – Ex. 20: Customer Account Embossing showing account info, Bates stamped BBY000040
272.			Christina Egner Deposition Exhibit – Ex. 21: “New Computer Setup,” for laptop purchase; Bates stamped BBY000012
273.			Christina Egner Deposition Exhibit – Ex. 22: Geek Squad Black Tie Protection Repair and Warranty Guide through Best Buy; Bates stamped BBY000014-35
274.			Rickey Glasco Deposition Exhibit – Ex. 1: Plaintiff Rickey Glasco’s Responses and Objections to Defendant Sony Electronic Inc.’s First Set of Interrogatories
275.			Rickey Glasco Deposition Exhibit – Ex. 2: Myspace page
276.			Rickey Glasco Deposition Exhibit – Ex. 3: Vimeo page
277.			Rickey Glasco Deposition Exhibit – Ex. 4: Myxer page
278.			Rickey Glasco Deposition Exhibit – Ex. 5: TinyPic page

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PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
279.			Rickey Glasco Deposition Exhibit – Ex. 6: Google+ page
280.			R. Glenn Akhavein Deposition Exhibit – Ex. 3: Litigation Support Agreement - #11072602 Rev. 1, Project #11072602
281.			Jack E. Gold Deposition Exhibit – Ex. 2: Rebuttal Expert Report in Support of Defendant
282.			Jack E. Gold Deposition Exhibit – Ex. 6: IRS Revenue Manual – 1.35.6 Property and Equipment Accounting
283.			Jack E. Gold Deposition Exhibit – Ex. 7: VAIO Update printout of Sony updates
284.			Jack E. Gold Deposition Exhibit – Ex. 8: Research Article “Replacing Enterprise PCs: The Fallacy of the 3-4 Year Upgrade Cycle”
285.			Jack E. Gold Deposition Exhibit – Ex. 9: Research Report “Keeping Notebooks Past Their Prime: A Study of Failures and Costs”
286.			Michael Osterman, Ph.D. Deposition Exhibit – Ex. 2: Expert Report, dated November 20, 2014
287.			Michael Osterman, Ph.D. Deposition Exhibit – Ex. 3: Addendum to “Response to Sherwood Expert Report,” dated December 22, 2014
288.			Michael Osterman, Ph.D. Deposition Exhibit – Ex. 4: “Inspection of the Laptops and Track Pads In Re Sony VAIO Computer Notebook Trackpad Litigation, Case No. 3:09-CV-2109CAB(MDD),” dated December 22, 2014

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No.	Date Marked	Date Admitted	Description
289.			Michael Osterman, Ph.D. Deposition Exhibit – Ex. 5: “Addendum to December 22, 2014 Report In Re Sony VAIO Computer Notebook Trackpad Litigation, Case No. 3:09-CV-2109 CAB(MDD),” dated February 3, 2015
290.			Michael Osterman, Ph.D. Deposition Exhibit – Ex. 6: Article titled “Accelerated Growth of Tin Whiskers”
291.			Michael Osterman, Ph.D. Deposition Exhibit – Ex. 7: Article titled “Pressure-Induced Growth of Metal Whiskers”
292.			Michael Osterman, Ph.D. Deposition Exhibit – Ex. 8: Article titled “Standards for Tin Whisker Test Methods of Lead-Free Components”
293.			Michael Osterman, Ph.D. Deposition Exhibit – Ex. 9: Article titled “Tin Whiskers: How to Mitigate and Manage the Risks”
294.			Michael Osterman, Ph.D. Deposition Exhibit – Ex. 10: Article titled “Statistical analysis of tin whisker growth”
295.			Michael Osterman, Ph.D. Deposition Exhibit – Ex. 17: Article titled “Assessing Tin Whisker Risk in Electronic Products”
296.			Andrew J. Perry Deposition Exhibit – Ex. 2: A. Perry Expert Report Support Data, Sony VAIO Notebook Computer Touch Pad Whisker Problem, November 20, 2014
297.			Andrew J. Perry Deposition Exhibit – Ex. 3: Expert Report Sony VAIO Computer Notebook Trackpad litigation

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PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
298.			Heather H. Xitco Deposition Exhibit – Ex. 2: “Egner, et al. v. Sony Electronics, Inc. Document Inventory”
299.			Heather H. Xitco Deposition Exhibit – Ex. 3: “Egner, et al. v. Sony Electronics, Report of Heather H. Xitco, CPA, MBA, CFF, November 17, 2014”
300.			Heather H. Xitco Deposition Exhibit – Ex. 4: “Robert H. Wallace, Expert Witness for Sony Electronics, Inc.”
301.			Jason J. Bonfig Deposition Exhibit – Ex. 13: Sell price and profit from laptops; Bates Number BBY000101-107
302.			William H. Fidoe Deposition Exhibit – Ex. 18: Log of customer complaints; Bates Number BBY000126-172
303.			Barbara J. Matul Deposition Exhibit – Ex. 22: Commercial Sales PSP document
304.			Nathan D. Omann Deposition Exhibit – Ex. 2: Best Buy warranty; Bates Number BBY000014-37
305.			Nathan D. Omann Deposition Exhibit – Ex. 3: Best Buy dealer/vendor agreement; Bates Number BBY000041-72
306.			Nathan D. Omann Deposition Exhibit – Ex. 4: Best Buy Service Agreement; Bates Number BBY000128-45
307.			Nathan D. Omann Deposition Exhibit – Ex. 7: Geek Squad City Employee Chart
308.			Nathan D. Omann Deposition Exhibit – Ex. 9: Defendant Best Buy Stores, L.P.’s Responses to Plaintiff’s First Set of Requests for Production of Documents

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PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
309.			Nathan D. Omann Deposition Exhibit – Ex. 11: Defendant Best Buy Stores, L.P.'s Objections to Plaintiff's Amended Notice of Deposition of Omann
310.			Kannan Raj Deposition Exhibit – Ex. 22: Email chain about touchpad test
311.			Kannan Raj Deposition Exhibit – Ex. 26: Email from Lin Buncho to Jesse Gallup and others dated March 22, 2010 about defect, Bates Number 0011902
312.			Kannan Raj Deposition Exhibit – Ex. 32: Email from Kannan Raj to Kannan Raj dated November 3, 2010 about replacement parts, Bates Number 0041567-69
313.			Cory Southern Deposition Exhibit – Ex. 1: Mr. Southern's LinkedIn Profile
314.			Cory Southern Deposition Exhibit – Ex. 19: Email dated July 9, 2010 re: touchpad sample, Bates SEL_0010417
315.			Cory Southern Deposition Exhibit – Ex. 20: Email exchange dated September 10, 2010 putting engineering parts on hold, Bates SEL_0010749-53
316.			Cory Southern Deposition Exhibit – Ex. 37: Email from Cory Southern dated September 26, 2011 about touchpad malfunction, Bates SEL_0011417-19
317.			Cory Southern Deposition Exhibit – Ex. 50: Email exchange dated January 25, 2011, about repair requests and attachments, Bates SEL_0011127-31
318.			Cory Southern Deposition Exhibit – Ex. 51: Email from Peter Tat dated January 7, 2011, Bates SEL_0018894-95

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PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
319.			Craig Hillman, Ph.D. Deposition Exhibit – Ex. 2: Report of Craig Hillman
320.			Craig Hillman, Ph.D. Deposition Exhibit – Ex. 3: Supplemental Report
321.			Craig Hillman, Gregg Kittlesen & Randy Schueller, “A New (Better) Approach to Tin Whisker Mitigation”
322.			Gerd Fischer & Bob Esser, “Change in Paradigm: Maximum Tin Whisker Lengths Just Got Longer”
323.			DfR Solutions, “The Tin Myth: How the Hi-Rel Industry Won”
324.			Dr. Craig Hillman, “What I Don’t Know That I Don’t Know: Things to Worry About with the Pb-Free Transition”
325.			Email from Lebow re Search terms, dated July 25, 2012 [Confidential – Pursuant to Court Order]
326.			Condensed version of the Deposition Transcript of Craig Hillman, Ph.D., taken February 7, 2013[Confidential Pursuant to Protective Order – Attorneys’ Eyes Only]
327.			SEL_0010982-10983 (Email from Sakuma re Stock Exchange Request and Substitution Parts Use Request, dated September 10, 2010) [Confidential]
328.			Abstract entitled “Obsolescence Management & the Impact on Reliability,” by Cheryl Tulkoff and Greg Caswell of DfRsolutions
329.			DfR Solutions Resource Center re Pb Components, printed 2/19/13 from http://www.dfrsolutions.com/resource-center/reliabilityconcerns/components

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No.	Date Marked	Date Admitted	Description
330.			SquareTrade, Inc. synopsis entitled “1 in 3 Laptops fail over 3 years: Netbooks fail 20% more than laptops; ASUS & Toshiba the most reliable
331.			TBR Quality Project survey re PC failure rates, dated 2011
332.			Letter from Lowther to Lebow re defendant’s proposed protocol, dated September 19, 2012
333.			Letter from Lebow to Plaintiffs’ Counsel, dated August 21, 2012, with attached Protocol for Observation and Investigation of Touchpad
334.			Dr. Craig Hillman Publication: “White Paper, The Tin Myth: How the Hi-Rel Industry Won,” describing how a “changeover to palladium” “should be quick and painless.”
335.			Dr. Craig Hillman Publication: “What I Don’t Know That I Don’t Know: Things to Worry About with the Pb-Free Transition, stating “Do not use tin plating on flex circuitry.”
336.			Dr. Craig Hillman Publication: “A New (Better) Approach to Tin Whisker Mitigation,” stating “bright tin [] is typically not allowed on electronic components.”
337.			New Jersey Consumer Fraud Act Jury Charge 4.43
338.			Economics of Software Verification, stating “residual defect density is a relatively poor estimator of product quality”
339.			Understand Customer Behavior and Complaints, stating “Research by TARP indicates most customers do not

IN RE SONY VAIO COMPUTER NOTEBOOK TRACKPAD LITIGATION
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PLAINTIFFS' TRIAL EXHIBIT LIST

No.	Date Marked	Date Admitted	Description
			complain when they encounter a problem”
340.			Declaration of Paul Stewart in Support of Sony Electronics Inc.’s Opposition to Plaintiffs’ Motion for Class Certification [Confidential Pursuant to Protective Order]
341.			Declaration of Paul Stewart in Support of Sony Electronics Inc.’s Opposition to Plaintiffs’ Motion for Class Certification [Confidential Pursuant to Protective Order]
342.			Glenn Akhavein Expert Report, dated January 14, 2013
343.			Glenn Akhavein Supplemental Expert Report, dated January 28, 2013
344.			Hillman Invoices (SEL_HILLMAN_011-26)
345.			Hillman Engagement Agreement (SEL_HILLMAN_027-28)
346.			PC Magazine: Readers’ Choice Awards
347.			PC World article: Laptop Reliability and Satisfaction: MacBooks Rule
348.			Cycles, Cells and Platters: An Empirical Analysis of Hardware Failures on a Million Consumer PCs
349.			Gartner: PC Hardware Reliability Improvements Lead to Longer Useful Life and Shorter Warranties
350.			Lenovo TBR Quality Project
351.			Sherwood Engagement Agreement (SEL_SHERWOOD003-13)
352.			Sherwood Invoices [Confidential Pursuant to Protective Order]
353.			Vaughn Engagement Agreement (SEL_VAUGHN_001-10)

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No.	Date Marked	Date Admitted	Description
354.			Vaughn Invoices (SEL_VAUGHN_001-24)
355.			Explanatory Notes SS-00254-0 Test Methods For Electronic Components, Lead-Free Soldering Parts Design Standards (SEL_0033651-56; SEL_0033721-729)
356.			Declaration of Timothy McGowan in Support of Defendant Sony Electronics Inc.'s Motion for Summary Judgment or Partial Summary Judgment (March 17, 2015)

EXHIBIT B

Exhibit B to Pretrial Order, Case No. 09-CV-2109 BAS MDD

Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D1		Osterman Exh. 6	Article: R.M. Fisker <i>et al.</i> "Accelerated Growth of Tin Whiskers," Acta Metallurgica, Vol. 2 (May 1954)	Expect
D2		Osterman Exh. 7	Article: Charles H. Pitt and Robert G. Henning, "Pressure-Induced Growth of Metal Whiskers," J. Applied Physics, Vol. 35 (1964)	Expect
D3			Article: "Mechanical and Electrical Characteristics of Tin Whiskers with Special Reference to Spacecraft" (1/14/1988) (Hillman Rebuttal Report, 12/19/14)	Expect
D4		Egner Exh. 14	Felony Complaint, People v. Christina Jakimowicz, County of San Diego (12/6/1994)	May
D5		Egner Exh. 15	Civil Action/Complaint, Platt v. William & Christina Jakimowicz, Superior Court of New Jersey, No. DC 962-97D (2/26/1997)	May
D6			Article: "Electroplating of Lead-Free Solder Alloys Composed of Sn-Bi and Sn-Ag" (1998) (Hillman Rebuttal Report, 12/19/14)	Expect
D7			Article: "Lead-free finishes-whisker studies and practical methods for minimizing the risk of whisker growth" (2001) (Hillman Rebuttal Report, 12/19/14)	Expect
D8		Egner Exh. 16	Summons, Return of Service, and Complaint, Chestnut Lane Apartments v. Christina Jakimowicz, Superior Court of New Jersey, No. DC 5625-01N (12/28/2001)	May
D9		Egner Exh. 18	Summons and Return of Service, Capital One Bank v. Christina Jamikowicz, Superior Court of New Jersey, No. DC-3365-02-F (8/28/2002)	May
D10			Article: "Pure Tin - The Finish of Choice for Connectors" (10/2003) (Hillman Rebuttal Report, 12/19/14)	Expect
D11			Article: "Microchip – Lead Free, RoHS-Compliant Solutions" (2004) (Hillman Rebuttal Report, 12/19/14)	Expect

Exhibit B to Pretrial Order, Case No. 09-CV-2109 BAS MDD

Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D12		Osterman Exh. 10	Article: Tong Fang, Michael Osterman, and Michael Pecht, "Statistical Analysis of Tin Whisker Growth", Microelectronics Reliability 46 (5/10/2005)	Expect
D13			Article: ON Semiconductor, "Matte Tin Plating for Pb-Free Devices Backward Compatibility to Tin-Lead Solders" (8/2005) (Hillman Rebuttal Report, 12/19/14)	Expect
D14			Article: Toshiba, "Transitioning to Lead (Pb)- Free Manufacturing with Toshiba Semiconductor Products" (9/2005) (Hillman Rebuttal Report, 12/19/14)	Expect
D15	SEL_0064366-0064367		Limited Warranty for the FZ Series	Expect
D16	SEL_0028233-0028453		2006 Sony User Guide - Personal Computer VGN-SZ100 Series	Expect
D17	SEL_0028475-0028698		2006 Sony User Guide - Personal Computer VGN-SZ200 Series	Expect
D18	SEL_0028720-0028949		2006 Sony User Guide - Personal Computer VGN-SZ300 Series	Expect
D19		Osterman Exh. 17	Article: Tong Fang, Sony Mathew, Michael Osterman, and Michael Pecht, "Assessing Tin Whisker Risk in Electronic Products," SMT (5/2006)	Expect
D20	SEL_0021646		Sony VAIO Service Training Material - Fall 2006	May
D21	SEL_0065405	Akhavein (2/8/13) Exh. 14	(VESCA) VAIO Service Escalation Report, [VOA] VGN-SZ SZ1 "Touchpad making resonant sound when it is tapped"	Expect
D22			Article: "Tin Whisker Formation Test Report" (12/2006) (Hillman Rebuttal Report, 12/19/14)	Expect
D23			Article: "iNEMI Recommendations on Lead-Free Finishes for Components Used in High-Reliability Products" (12/1/2006) (Hillman Rebuttal Report, 12/19/14)	Expect
D24	SEL_0064468-0064469		Limited Warranty for the SZ Series	Expect

Exhibit B to Pretrial Order, Case No. 09-CV-2109 BAS MDD

Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D25		Osterman Exh. 9	Article: Sony Mathew, Michael Osterman, <i>et al.</i> "Tin Whiskers: How to Mitigate and Manage the Risks," Proceedings of HDP (2007)	Expect
D26	SEL_0026240-0026420		2007 Sony User Guide - Personal Computer VGN-FZ100 Series	Expect
D27	SEL_0026508-0026694		2007 Sony User Guide - Personal Computer VGN-FZ200 Series	Expect
D28	SEL_0028991-0029229		2007 Sony User Guide - Personal Computer VGN-SZ400 Series	Expect
D29	SEL_0029232-0029456		2007 Sony User Guide - Personal Computer VGN-SZ600 Series	Expect
D30	SEL_0000007-0000008		Sony VAIO Software Update Information	May
D31	SEL_0000010-0000011		Sony, "Meet your VGN-SZ600 Series personal computer"	Expect
D32	SEL_0000040-0000066		Sony, Safety Information for VGN-SZ600 Series	May
D33	SEL_0000071-0000079		Sony VAIO PC Solution Guide	May
D34	SEL_0000080-0000081		Sony, "Notice for VGN-SZ600 Series users"	May
D35	SEL_0000163-0000178		Sony VAIO PC Solution Guide	May
D36	SEL_0000200-0000201		Sony VAIO software update information	May
D37	SEL_0000204-0000205		Sony, "Meet your VGN-SZ700 Series personal computer"	Expect
D38	SEL_0000244-0000259		Sony VAIO PC Solution Guide	May
D39	SEL_0000269-0000270		Sony, "Updating your computer"	May
D40	SEL_0032510-0032516		Communication Brief Spring 2007: VAIO SZ Notebook Computer - Standard Model SZ430	Expect
D41	SEL_0032503-0032509		Communication Brief Spring 2007: VAIO SZ Premium Notebook Computer	Expect
D42	SEL_0000009		Norton Internet Security Notice	May
D43	SEL_0022334-0022338		Sony VAIO Service Training Manual, Spring 2007 New Chassis Training	Expect

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D44	SEL_0001079-0001111		Sony Presentation, "IRX-3940 Introduction"	May
D45			Article: Analog Devices, "Tin Whisker Summary" (5/2007) (Hillman Rebuttal Report, 12/19/14)	Expect
D46	SEL_0000012-0000039		Sony, Safety Information for VGN-SZ600 Series	May
D47	SEL_0000097-0000124		Sony, Safety Information for VGN-SZ600 Series	May
D48	SEL_0000184		Sony VGN-XXXXX Schematic	May
D49	SEL_0022869-0022913		Sony VAIO Service Training Manual, Summer 2007 New Chassis Training	Expect
D50	SEL_0001034-0001078		Sony VAIO Summer '07 New Chassis Training	May
D51	SEL_0001112-0001165		Sony Presentation, "IRX-3980 Introduction"	May
D52	SEL_0032490-0032496		Messaging Documents Fall 2007: VAIO FZ Premium Notebook	Expect
D53	SEL_0021647-0021697		Sony VAIO Service Training Manual, VAIO Fall 2007 New Chassis Training	Expect
D54	SEL_0000922-0000972		Sony VAIO Fall '07 New Chassis Training	May
D55	SEL_0001203-0001240		Sony Presentation, "IRX-4160 Introduction"	May
D56	SEL_0064307	Akhavein (2/8/13) Exh. 13	Sony Technical News No. V07E072	May
D57	SEL_0064312-0064313	Akhavein (2/8/13) Exh. 12	Sony Technical News No. V07E076	May
D58	SEL_0000125-0000152		Sony, Safety Information for VGN-SZ600 Series	May
D59	SEL_0001574		Sony, Event Call-In Data Spreadsheet	Expect
D60	SEL_0000206-0000233		Sony, Safety Information for VGN-SZ700 Series	May
D61	SEL_0000236		Sony VGN-XXXXX Schematic	May

Exhibit B to Pretrial Order, Case No. 09-CV-2109 BAS MDD

Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D62	SEL_0064311		Sony Service Bulletin - NB07-056	Expect
D63	SEL_0064309		Sony Service Bulletin - NB07-056R1	Expect
D64	SEL_0029747-0029981		Sony User Guide: Personal Computer VGN-SZ700 Series	Expect
D65	SEL_0000242-0000243		Sony, "Notice for VGN-SZ700 Series users"	May
D66	SEL_0000265-0000266		Sony Style "20% Online Accessory Coupon!"	May
D67	SEL_0000409	Raj Exh. 6; Southern Exh. 8	Sony Service Bulletin - NB08-003	Expect
D68	SEL_0000441		KNOVA: "The mouse or touchpad is moving erratically or jumping around after installing a Palm handheld..."	May
D69	SEL_0000442		KNOVA: "The mouse or touchpad is moving erratically or jumping around after installing a Palm handheld..."	May
D70	SEL_0020077	Akhavein (2/8/13) Exh. 9; Raj Exh. 7; Southern Exh. 7	Email: Koyama to Chihara, "Cursor moves in opposite direction issues happen on VGN-SZ6xx"	Expect
D71	SEL_0022339-0022351		Sony VAIO Spring 2008 New Model Training	Expect
D72	SEL_0000973-0001033		Sony VAIO Spring '08 New Model Training	May
D73	SEL_0004081		Sony Service Bulletin - NB08-006	Expect
D74	SEL_0047104-0047107	Southern Exh. 6; Hillman (2/7/13) Exh. 5; Raj Exh. 5	Email: Mitsutake to Chihara, "SZxxx Series Touchpad Rework"	May
D75	SEL_0064324	Hillman (2/7/13) Exh. 4	Sony Service Bulletin - NB08-003R1	Expect
D76	SEL_0000405-0000406	Raj Exh. 8; Southern Exh. 9	Sony Technical News No. V08E028	May

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D77	SEL_0000407-0000408	Raj Exh. 9; Southern Exh. 10	Sony Technical News No. V08E036	May
D78	SEL_0064319-0064320		Sony Service Bulletin - NB08-025	Expect
D79	SEL_0023624-0023760		Sony VAIO Seasonal Training - Summer 2008	Expect
D80	SEL_0051985	Nickel Exh. 15	Email: Koningsor to Nickel, "SZ Touchpad Timeline"	May
D81	SEL_0008389	Nickel Exh. 23; Gold Exh. 13	Email: Karakas to Nickel, "3rd Party Operations Flash - SZ Touchpad Working in reverse - URGENT"	May
D82	SEL_0008389-0008390		Email: Karakas to Nickel, "3rd Party Operations Flash - SZ Touchpad Working in reverse - URGENT"	May
D83	SEL_0064325	Akhavein (2/8/13) Exh. 10; Southern Exh. 11; Raj Exh. 13	Sony Service Bulletin - NB08-003R2	Expect
D84	SEL_0064316-0064317		Sony Service Bulletin - NB08-025R1	Expect
D85	SEL_0065407		(VESCA) VAIO Service Escalation Report, [VOA] VGN-SZ6xx (WasabiSR) "Cursor moves in opposite direction issue"	Expect
D86	SEL_0023477-0023623		Sony VAIO Seasonal Training - Fall 2008	Expect
D87	SEL_0065408		(VESCA) VAIO Service Escalation Report, [VOA] VGN-FZxxx "Touchpad Button Issue"	Expect
D88	SEL_0065406	Akhavein (2/8/13) Exh. 8	(VESCA) VAIO Service Escalation Report, [VOA] VGN-SZ, "Cursor moves in opposite direction of input"	Expect
D89		Southern Exh. 32; Raj Exh. 15	VAIO Service Escalation Report [VOA] VGN-SZ, Cursor moves in opposite direction of input command	Expect

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D90	SEL_0003927-0003929	Xitco Exh. 8; Raj Exh. 10; Southern Exh. 12; Perry Exh. 6; Gold Exh. 12; Wallace Exh. 6	VGN – SZ Touchpad (Reversal/Opposite Direction) – Proposal – 3 Year Limited Warranty	Expect
D91	SEL_0011753-0011755	Nickel Exh. 12	VGN – SZ Touchpad (Reversal/Opposite Direction) – Proposal – 3 Year Limited Warranty	May
D92	SEL_0001575		Sony, Event Call-In Data Spreadsheet	Expect
D93	SEL_0064941-0064942		Limited Warranty for the EB Series and F Series	Expect
D94	SEL_0032450-0032451		Limited Warranty for the NW Series	Expect
D95	SEL_0000337-0000338	Egner Exh. 3	Sony Limited Warranty Statement (2009)	Expect
D96	SEL_0016386-0016537	Egner Exh. 4	2009 Sony User Guide - Personal Computer VGN-NW Series	Expect
D97	SEL_0027690-0027846		2009 Sony User Guide - Personal Computer VGN-NW Series	Expect
D98	SEL_0000351-0000352		Sony Quick Start Guide (VGN-NW Series)	May
D99	SEL_0000393		Sony, Spec Label for VGN-NW240F/P	May
D100	SEL_0000525-0000549		Sony, "Pokerman Introduction"	May
D101		Osterman Exh. 8	Article: Tadahiro Shibutani, Michael Osterman, Michael Pecht, "Standards for Tin Whisker Test Methods on Lead-free Components," IEEE Transactions of Components and Packaging Tech., Vol. 32, No. 2 (3/2009)	Expect
D102	SEL_0041225-0041229	Raj Exh. 39; Southern Exh. 13	Sony, New Models Report - Fall 09 Field Issues	Expect
D103		Gold Exh. 9	Report: "Keeping Notebooks Past Their Prime: A Study of Failures and Costs" (4/2009) (Gold Rebuttal Report, 12/22/14)	Expect

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D104	SEL_0022352-0022478		Sony VAIO Seasonal Training - Spring 2009	Expect
D105	SEL_0022914-0023031		Sony VAIO Seasonal Training - Summer 2009	Expect
D106	SEL_0000553-670		Sony VAIO Seasonal Training - Summer 2009	May
D107			Article: "Tin Whisker Prevention with SnBi Plating" (7/22/2009) (Hillman Rebuttal Report, 12/19/14)	Expect
D108	SEL_0000353-0000376		Safety Information for VGN-NW Series	May
D109	SEL_0000384-0000392		Sony VAIO PC Solution Guide	May
D110	SEL_0009311-0009314		Sony, VGNSZ Touch Pad Replacement Symptom Report	Expect
D111	SEL_0009310-0009314	Raj Exh. 12	Email: Merski to Ardinger and Stewart, "VGNSZ_TP_Repair093009_B.ppt"	May
D112	SEL_0032525-0032527		Sony, Messaging Document Fall 2009 - VAIO NW Notebook	Expect
D113	SEL_0021698-0021821		Sony VAIO Seasonal Training - Fall 2009	Expect
D114	SEL_0000671-0000794		Sony VAIO Seasonal Training - Fall 2009	May
D115	SEL_0001576		Sony, Event Call-In Data Spreadsheet	Expect
D116	Egner000001	Egner Exh. 2	Christina Egner's Best Buy Receipt (12/11/2009)	May
D117	BBY000012	Egner Exh. 21	Christina Egner's New Computer Setup Sheet (12/11/2009)	May
D118	SEL_0035569-0035570	Southern Exh. 15	Email: Koningsor to Ardinger, "VGN-NW Model series Touch Pad Removal/Replacement"	May
D119	SEL_0013764-0013765	Southern Exh. 16	Email: Ardinger to Ridge, "VGN_NW270F Coming in"	May
D120		Egner Exh. 1	Christina Egner's Etsy transaction receipt (12/27/2009)	May
D121	SEL_0001474-0001495		Sony, "VGN-NW Series Service Manual"	May
D122	SEL_0032517-0032520		Sony, VAIO EB Series - Product Information Document	Expect
D123	SEL_0032521-0032524		Sony, VAIO F Series - Product Information Document	Expect

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D124	SEL_0063288-0063291		Sony, VAIO F Series 3D - Product Information Document	Expect
D125	SEL_0028068-0028218		2010 Sony User Guide - Personal Computer VGN-NW Series	Expect
D126	SEL_0030973-0031141		2010 Sony User Guide - Personal Computer VPCF11 Series	Expect
D127	SEL_0031167-0031338		2010 Sony User Guide - Personal Computer VPCF12 Series	Expect
D128	SEL_0031388-0031565		2010 Sony User Guide - Personal Computer VPCF13 Series	Expect
D129	SEL_0030011-0030173		2010 Sony User Guide - Personal Computer VPCE Series	Expect
D130	SEL_0000397-0000398		T/S for Touchpad Reversal (VGN-SZ series)	May
D131	SEL_0000424		KNOVA: "The touchpad movements are reversed."	May
D132	SEL_0000425		KNOVA: "The touchpad motion or movements are reversed."	May
D133	SEL_0000426		KNOVA: "The touchpad motion or movements are reversed."	May
D134	SEL_0000427		KNOVA: "The touchpad motion or movements are reversed."	May
D135	SEL_0000428		KNOVA: "The touchpad motion or movements are reversed."	May
D136	SEL_0000429		KNOVA: "The touchpad motion or movements are reversed."	May
D137	SEL_0000430		KNOVA: "The touchpad movements are reversed."	May
D138	SEL_0000431		KNOVA: "The touchpad motion or movements are reversed."	May
D139	SEL_0000432		Edit history for KNOVA article	May
D140	SEL_0000433		Edit history for KNOVA article	May
D141	GLASCO_000001-000002	Glasco Exh. 8	Rickey Glasco's Fry's Invoice	Expect
D142	SEL_0017505-0017506		Email: Gonzalez to Southern, "LCSC Refurb Quality/Engineering Review"	Expect
D143	EGNER000010	Egner Exh. 6	Sony, Statement of Work for Christina Egner's Computer	Expect

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D144	EGNER000006	Egner Exh. 7	Sony Letter sent with Christina Egner's repaired computer	Expect
D145	SEL_0000394		NB CDS UPL FALL 09 (VGN-NW240F/P)	May
D146	SEL_0000475		KNOVA: "The touchpad does not work properly, works without touching it, works intermittently or errati..."	May
D147	SEL_0000476		KNOVA: "The touchpad does not work properly, works without touching it, works intermittently or errati..."	May
D148	SEL_0000477		KNOVA: "The touchpad does not work properly, works without touching it, works intermittently or errati..."	May
D149	SEL_0000478		KNOVA: "The touchpad does not work properly, works without touching it, works intermittently or errati..."	May
D150	SEL_0000479		KNOVA: "The touchpad does not work properly, works without touching it, works intermittently or errati..."	May
D151	SEL_0000480		Edit history for KNOVA article	May
D152	SEL_0000436		KNOVA: "The touchpad pointer is unstable while browsing the Internet."	May
D153	SEL_0000437		KNOVA: "The touchpad pointer is unstable while browsing the Internet."	May
D154	SEL_0000438		KNOVA: "The touchpad pointer is unstable while browsing the Internet."	May
D155	SEL_0000439		KNOVA: "The touchpad pointer is unstable while browsing the Internet."	May
D156	SEL_0000454		KNOVA: "The touchpad pointer is unstable while browsing the Internet."	May
D157	SEL_0000455		KNOVA: "The touchpad pointer is unstable while browsing the Internet."	May

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D158	SEL_0000456		KNOVA: "The touchpad pointer is unstable while browsing the Internet."	May
D159	SEL_0000457		KNOVA: "The touchpad pointer is unstable while browsing the Internet."	May
D160	SEL_0000458		KNOVA: "The touchpad pointer is unstable while browsing the Internet."	May
D161	SEL_0000466		KNOVA: "The touchpad pointer is jumping around and activating icons it touches, or closes programs automatically."	May
D162	SEL_0000467		KNOVA: "The touchpad pointer is jumping around and activating icons it touches, or closes programs automatically."	May
D163	SEL_0000468		KNOVA: "The touchpad pointer is jumping around and activating icons it touches, or closes programs automatically."	May
D164	SEL_0000469		KNOVA: "The touchpad pointer is jumping around and activating icons it touches, or closes programs automatically."	May
D165	SEL_0000470		KNOVA: "The touchpad pointer is jumping around and activating icons it touches, or closes programs automatically."	May
D166	SEL_0000459		Edit history for KNOVA article	May
D167	SEL_0000471		Edit history for KNOVA article	May
D168	EGNER000011	Egner Exh. 9	Sony, Statement of Work for Christina Egner's computer	Expect
D169	EGNER000007	Egner Exh. 8	VAIO Notebook Repair Inventory Sheet for Christina Egner's Computer	Expect
D170	SEL_0003183-0003190		Customer Service and Repair Records from CS3 Database for Christina Egner's Computer	Expect
D171	EGNER000012	Egner Exh. 10	Sony Letter sent with Christina Egner's repaired computer	Expect
D172	SEL_0016547		Christina Egner Customer Service and Repair Records	Expect

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D173	SEL_0003173-0003182		Christina Egner Customer Service and Repair Records from SAP Database	Expect
D174	SEL_0022479-0022605		Sony VAIO Seasonal Training - Spring 2010	Expect
D175	SEL_0000795-0000921		Sony VAIO Seasonal Training - Spring 2010	May
D176	SEL_0023032-0023143		Sony VAIO Seasonal Training - Summer 2010	Expect
D177	SEL_0010417	Southern Exh. 19	Email: Southern to Roxas, "Sample VGNNW"	May
D178	SEL_0008122-0008131	Akhavein (2/8/13) Exh. 18; Raj Exh. 16; Hillman (3/2/15) Exh. 6	Foxconn, "Pokerman T/P no function Issue Investigation and Improvement Report"	Expect
D179	SEL_0041442-0041448		ALPS, "5C report for ALPS Touchpad Whisker Issue"	Expect
D180	SEL_0052255-0052262	Hillman (2/7/13) Exh. 10	ALPS Presentation, 5C report for ALPS Touchpad Whisker issue	Expect
D181	SEL_0061573-0061586	Osterman Exh. 12; Raj Exh. 41	Email: Raj to SD-VAIO-SQA, "Quality Issue - Whisker issue for Freedom B/C Suzaku 1/2," with attachments	Expect
D182	SEL_0041440-0041448	Southern Exh. 45; Liu Exh. 4	Email: CNB-CS1V to Liu, "[FreedomB/C][Suzaku1/2] Touchpad not work," with attachment	May
D183	SEL_0010749-0010753	Southern Exh. 20	Email: Southern to Fabela, "Stock Exchange Request (VPCEB keyboard)(BGN-NW, VPCF, VPCEB, EC Touchpad) & Substitution Parts Use Request (ODD BD-5730S-V2, V3)"	May
D184	SEL_0004085-0004086	Southern Exh. 21	Sony Service Bulletin - NB10-054	Expect
D185	SEL_0010861-0010868	Akhavein (2/8/13) Exh. 7	Sony VAIO CR90 Summary	Expect
D186	SEL_0021822-0021906		Sony VAIO Seasonal Training - Fall 2010	Expect
D187	SEL_0000414		KNOVA: "The touchpad does not work properly . . ."	May

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D188	SEL_0000415		KNOVA: "The touchpad does not work properly . . ."	May
D189	SEL_0000416		KNOVA: "The touchpad does not work properly . . ."	May
D190	SEL_0000417		KNOVA: "The touchpad does not work properly . . ."	May
D191	SEL_0000418		KNOVA: "The touchpad does not work properly . . ."	May
D192	SEL_0000419		KNOVA: "The touchpad does not work properly . . ."	May
D193	SEL_0000423		KNOVA: "The touchpad does not work properly . . ."	May
D194	SEL_0000472		KNOVA: "The touchpad does not work properly, works without touching it, works intermittently or errati..."	May
D195	SEL_0000473		KNOVA: "The touchpad does not work properly, works without touching it, works intermittently or errati..."	May
D196	SEL_0000474		KNOVA: "The touchpad does not work properly, works without touching it, works intermittently or errati..."	May
D197	SEL_0000420		Edit history for KNOVA article	May
D198	SEL_0000421		Edit history for KNOVA article	May
D199	SEL_0064344-0064345	Osterman Exh. 13; Southern Exh. 22; Akhavein (2/8/13) Exh. 15	Sony Service Bulletin - NB10-059	Expect
D200	SEL_0005419-0005422		Sony Technical News - No. V10E077	May
D201	SEL_0065410		(VESCA) VAIO Service Escalation Report, [VMOA] "Whisker issue - Freedom/Suzaku"	Expect
D202	SEL_0065409		(VESCA) VAIO Service Escalation Report, [VOA] VGN-NWxxx "Touchpad/Keyboard is not working properly"	Expect
D203		Southern Exh. 24; Raj Exh. 24	(VESCA) VAIO Service Escalation Report, [VMOA] "Whisker issue - Freedom/Suzaku"	Expect

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D204		Southern Exh. 44	(VESCA) VAIO Service Escalation Report, [VOA] VGN-NWxxx “Touchpad/Keyboard is not working properly”	Expect
D205	SEL_0052247-0052255	Raj Exh. 40	Sony Presentation, “VMOA - Whisker Issue”	May
D206	SEL_0052247-0052262		Sony Presentation, VMOA - Whisker Issue	May
D207	SEL_0057163-0057166	Raj Exh. 33	Email: Raj to Koyama, “[UC, PA] [Parts quality issue] [VPCEB, EC, F, VGN-NW] Touchpad Module”	May
D208	SEL_0001577		Sony, Event Call-In Data Spreadsheet	Expect
D209		Egner Exh. 11	Letter from Cooley LLP to Doyle Lowther LLP Re <i>Sony VAIO Computer Notebook Trackpad Litigation</i>	Expect
D210	SEL_0064342		Sony Service Bulletin - NB10-007R2	Expect
D211	SEL_0064343		Sony Technical News - No. V10E011R1	May
D212	SEL_0000449		KNOVA: “The touchpad is unresponsive, works without touching it, or does not work properly.”	May
D213	SEL_0000450		KNOVA: “The touchpad is unresponsive, works without touching it, or does not work properly.”	May
D214	SEL_0000451		KNOVA: “The touchpad is unresponsive, works without touching it, or does not work properly.”	May
D215	SEL_0000452		KNOVA: “The touchpad is unresponsive, works without touching it, or does not work properly.”	May
D216	SEL_0000453		Edit history for KNOVA article	May
D217	SEL_0000422		KNOVA: “The touchpad does not work properly . . .”	May
D218	SEL_0038186-0038190	Osterman Exh. 16	Foxconn Technical News – T/N: FXC10-036R1	Expect

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D219	SEL_0064336-0064337	Osterman Exh. 14; Southern Exh. 23; Southern Exh. 27; Akhavein (2/8/13) Exh. 16	Sony Service Bulletin - NB10-059R1	Expect
D220	SEL_0004683-0004686	Osterman Exh. 15	Sony Technical News – No. V10E077R1	May
D221			Article: “Microsemi – RoHS Lead-Free Initiative” (2011) (Hillman Rebuttal Report, 12/19/14)	Expect
D222			Article: Micron, “Lead Frame Package User Guidelines” (2011) (Hillman Rebuttal Report, 12/19/14)	Expect
D223	SEL_0031594-0031767		2011 Sony User Guide - Personal Computer VPCF2 Series	Expect
D224	SEL_0057227-0057230	Liu Exh. 5; Nickel Exh. 17; Sherwood Exh. 15	Email: CNB-MQA1V to Liu, “Foxconn”	Expect
D225	SEL_0057227-0057236		Email: CNB-MQA1V to Liu, “Foxconn”	Expect
D226	SEL_0000443		KNOVA: “The touchpad pointer is jumping around and activating icons it touches, or closes programs automatically.”	May
D227	SEL_0000444		KNOVA: “The touchpad pointer is jumping around and activating icons it touches, or closes programs automatically.”	May
D228	SEL_0000445		KNOVA: “The touchpad pointer is jumping around and activating icons it touches, or closes programs automatically.”	May
D229	SEL_0000446		KNOVA: “The touchpad pointer is jumping around and activating icons it touches, or closes programs automatically.”	May
D230	SEL_0000447		KNOVA: “The touchpad pointer is jumping around and activating icons it touches, or closes programs automatically.”	May

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D231	SEL_0000460		KNOVA: "The touchpad pointer may seem unstable or jump around if the touchpad is accidentally touched while typing."	May
D232	SEL_0000461		KNOVA: "The touchpad pointer may seem unstable or jump around if the touchpad is accidentally touched while typing."	May
D233	SEL_0000462		KNOVA: "How to disable the Tapping and Web Assistant features of the touchpad."	May
D234	SEL_0000463		KNOVA: "How to disable the Tapping and Web Assistant features of the touchpad."	May
D235	SEL_0000464		KNOVA: "The touchpad pointer may seem unstable or jump around if the touchpad is accidentally touched while typing."	May
D236	SEL_0000448		Edit history for KNOVA article	May
D237	SEL_0000465		Edit history for KNOVA article	May
D238		Egner Exh. 12	Amended Consolidated Class Action Complaint for Damages and Equitable Relief (1/24/2011)	Expect
D239	SEL_0057241		Email: Raj to Russo, "Japan Team Visit - Presentation_kannan_1_Chris.pptx"	Expect
D240	SEL_0057242-0057245		Presentation re TP issue for US Market	Expect
D241	BBY000040	Egner Exh. 20	Account Embossing - Best Buy screen shot of credit card account for Thomas Egner	May
D242	SEL_0068542-0068543		Sony Service Bulletin - NB11-004	Expect
D243	SEL_0064361-0064365		Sony Technical News No. V11E007	May
D244	SEL_0041845-0041853; SEL_0041855	Southern Exh. 35	Email: Laguna to Joaquin, "Presentation for Global SanChalle meeting," with attachment	May
D245	SEL_0022606-0022766		Sony VAIO Seasonal Training - Spring 2011	Expect

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D246	SEL_0065825		Rickey Glasco Customer Service and Repair Records from CS3 Database	Expect
D247	SEL_0019054-0019085		Presentation, VM Vaio Serviceability Survey from PA Region	May
D248			Plaintiff's First Set of Interrogatories to Best Buy Stores, L.P. (5/27/2011)	May
D249			Plaintiff's First Set of Requests for Production of Documents to Best Buy Stores, L.P. (5/27/2011)	May
D250	SEL_0041853-0041855		US, VPCEB Touchpad and Audio Trends	May
D251			Defendant Sony Electronics Inc.'s First Set of Requests for Production of Documents and Things to Plaintiff Egner (6/15/2011)	May
D252			Defendant Sony Electronics Inc.'s First Set of Interrogatories to Plaintiff Christina Egner (6/16/2011)	May
D253	SEL_0023144-0023294		Sony VAIO Seasonal Training - Summer 2011	Expect
D254	SEL_0041844-0041845		Email: Laguna to Cowie, "Presentations"	May
D255	SEL_0064353-0064354	Akhavein (2/8/13) Exh. 17	Sony Service Bulletin - NB10-059R2	Expect
D256	SEL_0064355-0064358		Sony Technical News - No. V10E077R2	May
D257			Defendant Best Buy Stores, L.P.'s Responses to Interrogatories, Set One (7/27/2011)	May
D258			Defendant Best Buy Stores, L.P.'s Responses to Plaintiff's First Set of Requests for Production of Documents (7/27/2011)	May
D259	SEL_0065404		(VESCA) VAIO Service Escalation Report [VMOC] Touchpad issue on 11/1Q Tsumugi and Eiger	Expect
D260			Plaintiff Christina Egner's Responses and Objections to Defendant Sony Electronics Inc.'s First Set of Interrogatories (8/10/2011)	May

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D261			Plaintiff Christina Egner's Responses and Objections to Sony Electronics, Inc.'s First Set of Requests for Production and Other Things (8/10/2011)	May
D262	SEL_0019052-0019054; SEL_0019080	Southern Exh. 36	Email: Farace to Raj, "VAIO PA Region Engineering Summit"	May
D263	SEL_0064350		Sony Service Bulletin - NB11-027	Expect
D264	SEL_0064351-0064352		Sony Technical News No. V11E029	May
D265	SEL_0001324-1417		Troubleshooting articles regarding various touchpad-related issues	May
D266	SEL_0021907-0022103		Sony VAIO Seasonal Training - Fall 2011	Expect
D267		Akhavein (2/8/13) Exh. 3	Kevin Kennedy Associates Litigation Support Agreement (11/10/2011)	May
D268			Declaration of Paul Stewart in Support of Defendant Sony Electronics Inc.'s Position re Joint Motion for Determination of Discovery Dispute -- Scope of Discovery (filed under seal).	May
D269	SEL_0001578		Sony, Event Call-In Data Spreadsheet	Expect
D270	SEL_0001579		Sony, Event Call-In Data Spreadsheet	Expect
D271		Glasco Exh. 4	Printout from "myxer" (2012)	May
D272		Glasco Exh. 6	Printout from "plus.Google." (2012)	May
D273		Glasco Exh. 3	Printout from "VIMEO" (2012)	May
D274	BBY000008-9	Egner Exh. 19	Fax: HSBC Merchant Operations to Renee Johnson, Best Buy Credit Application - Thomas Egner Applicant	May
D275	SEL_0022767-0022868		Sony VAIO Seasonal Training - Spring 2012	Expect

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D276			IRS Manual, Part 1. Organization, Finance, and Management; Chapter 14. Real Estate and Facilities Management; Section 4. Personal Property Management, 1.14.4.14.3 (05-08-2012) Useful Life Standards, available at http://www.irs.gov/irm/part1/irm_01-014-004.html .	Expect
D277	SEL_0023295-0023476		Sony VAIO Seasonal Training - Summer 2012	Expect
D278			Defendant Best Buy Stores, L.P.'s Request for Production of Documents and Things to Plaintiff Christina Egner Pursuant to Federal Rules of Civil Procedure 26 and 34 (9/25/2012)	May
D279	SEL_0022104-0022333		Sony VAIO Seasonal Training - Fall 2012	Expect
D280			Plaintiff Christina Egner's Objections to Defendant Best Buy Stores, L.P.'s First Set of Requests for Production of Documents and Things (10/25/2012)	May
D281			Defendant Best Buy Stores, L.P.'s First Set of Interrogatories to Plaintiff Christina Egner (10/31/2012)	May
D282			Defendant Best Buy Stores, L.P.'s First Set of Requests for Admissions to Plaintiff Christina Egner (10/31/2012)	May
D283			Defendant Sony Electronic Inc.'s First Supplemental Responses and Objections to Plaintiff Christina Egner's Second Set of Interrogatories and any Supplements Thereto (10/31/2012)	May
D284		Akhavein (2/8/13) Exh. 6	Defendant Sony Electronic Inc.'s Second Supplemental Responses to Plaintiff Christina Egner's First Set of Interrogatories and any Supplements Thereto (11/5/2012)	May
D285		Egner Exh. 17	Christina Egner's Trackpad Video (11/14/2012)	Expect
D286		Egner Exh. 23	Print out from "momsbabypooh.blogspot.com (11/15/2012)	May
D287			Video: 11/16/2012 Inspection of Christina Egner's Computer	Expect

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D288			Video: 11/16/2012 Inspection of Rickey Glasco's Computer	Expect
D289		Glasco Exh. 10	Second Amended Consolidated Class Action Complaint for Damages and Equitable Relief (11/21/2012)	Expect
D290		Glasco Exh. 1	Plaintiff Rickey Glasco's Responses and Objections to Defendant Sony Electronics Inc.'s First Set of Interrogatories (11/27/2012)	May
D291			Plaintiff Rickey Glasco's Responses and Objections to Sony Electronics, Inc.'s First Set of Requests for Production and Other Things (11/27/2012)	May
D292		Xitco Exh. 5	Defendant Sony Electronic Inc.'s Third Supplemental Responses to Plaintiff Christina Egner's First Set of Interrogatories and any Supplements Thereto (12/3/2012)	May
D293		Glasco Exh. 5	Printout from "tinypic" (12/5/2012)	May
D294			Plaintiff Christina Egner's Responses and Objections to Defendant Best Buy Stores, L.P.'s First Set of Interrogatories (12/7/2012)	May
D295			Plaintiff Christina Egner's Responses and Objections to Defendant Best Buy Stores, L.P.'s First Set of Requests for Admissions (12/7/2012)	May
D296		Akhavein (2/8/13) Exh. 4	Glenn Akhavein Report (1/14/2013)	May
D297		Akhavein (2/8/13) Exh. 5	Glenn Akhavein Supplemental Report (1/28/2013)	May
D298			Declaration of Chris Russo in Suport of Defendant Sony Electronics Inc.'s Opposition to Plaintiffs' Motion for Class Certification (filed under seal) and Exhibits	May
D299			Declaration of Paul Stewart in Support of Defendant Sony Electronics Inc.'s Opposition to Plaintiffs' Motion for Class Certification and Exhibits (filed under seal) (4/3/2013)	May

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D300			Article: Westinghouse, "Tin Whisker Inspection and Printed Circuit Board Cleaning Services" (6/2013) (Hillman Rebuttal Report, 12/19/14)	Expect
D301			Article: "Effect of direct current and pulse plating parameters on tin whisker growth from tin electrodeposits on copper and brass substrates" (9/2013) (Hillman Rebuttal Report, 12/19/14)	Expect
D302		Akhavein (3/10/15) Exh. 5; Sherwood Exh. 14	Article: Gartner, "PC Hardware Reliability Improvements Lead to Longer Useful Life and Shorter Warranties" (11/25/2013)	Expect
D303		Akhavein (3/10/15) Exh. 11	Article: Rescuecom Report, "2014 Computer Reliability Report; Including Tablets"	Expect
D304			Article: "Effect of a high-temperature pre-bake treatment on whisker formation under various thermal and humidity conditions for electrodeposited tin films on copper substrates" (3/2014)	Expect
D305		Xitco Exh. 7	Defendant Sony Electronic Inc.'s Responses to Plaintiffs' First Set of Special Interrogatories Regarding Merits Discovery (3/27/2014)	May
D306		Gold Exh. 6	IRS Manual. Part I. Organization, Finance, and Management, Chapter 35. Financial Accounting, Section 6. Property and Equipment Accounting, 1.35.6.10.1 Information Technology Equipment (5/5/2014) (Gold Rebuttal Report, 12/22/14)	Expect
D307			Defendant Sony Electronic Inc.'s Responses and Objections to Plaintiffs' Second Set of Interrogatories Regarding Merits Discovery and any Supplements Thereto (7/10/2014)	May
D308		Gold Exh. 8	Report: "Replacing Enterprise PCs: The Fallacy of the 3-4 Year Upgrade Cycle" (8/2014) (Gold Rebuttal Report, 12/22/14)	Expect
D309			Article: "The Elimination of Whiskers from Electroplated Tin" (8/13/2014) (Hillman Rebuttal Report, 12/19/14)	Expect

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D310		Xitco Exh. 6; Wallace Exh. 7	Defendant Sony Electronic Inc.'s First Supplemental Responses to Plaintiffs' Second Set of Interrogatories Regarding Merits Discovery Nos. 5-7 (8/27/2014)	May
D311			Defendant Sony Electronic Inc.'s Responses and Objections to Plaintiffs' Third Set of Interrogatories Regarding Merits Discovery	May
D312			Article: "Effective Tin Whisker Prevention - Their Causes and How to Prevent Them" (10/2014) (Hillman Rebuttal Report, 12/19/14)	Expect
D313			Expert Report of Jim Vaughn, CFCE, EnCE in Support of Defendants, with exhibits (10/17/2014)	Expect
D314		Perry Exh. 4	Retainer Invoice for Andrew Perry (10/27/2014)	May
D315		Xitco Exh. 3	Heather H. Xitco Report (11/17/2014)	May
D316			Expert Report of Craig D. Hillman, PhD In Support of Defendants and Appendices thereto (11/20/2014)	Expect
D317		Perry Exh. 3	Report of Dr. Andrew J. Perry (11/20/2014)	May
D318		Osterman Exh. 2	Report of Michael Osterman (11/20/2014)	May
D319		Perry Exh. 5	Andrew Perry Invoices - 11/18/2014 and 12/9/2014	May
D320			Rebuttal Expert Report of Craig D. Hillman, PhD in Support of Defendant and Appendices thereto (12/19/2014)	Expect
D321			Report of Robert H. Wallace for Sony Electronics, Inc. and Exhibits and Appendices thereto (12/19/2014)	Expect
D322			Jack Gold Rebuttal Expert Report in Support of Defendant and Appendices thereto (12/22/2014)	Expect
D323		Osterman Exh. 4	Michael Osterman Inspection of the Laptops and Trackpads Report (12/22/2014)	May

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D324			Article: Rohm, "Lead-Free Technology Report" (2015) (Hillman Rebuttal Report, 12/19/14)	Expect
D325		Osterman Exh. 5	Michael Osterman Addendum to 12/22/14 Inspection Report (2/3/2015)	May
D326			Declaration of Timothy McGowan in Support of Defendant Sony Electronics Inc.'s Motion for Summary Judgment or Partial Summary Judgment and Exhibits (filed under seal) (3/17/2015)	May
D327			Declaration of Timothy McGowan in Support of Defendant Sony Electronics Inc.'s Motion for Class Decertification and Exhibits (filed under seal) (3/27/2015)	May
D328	Akhavein_000001 - 000037	Akhavein (3/10/15) Exh. 2	Akhavein Litigation Support Agreement and Invoices	May
D329			Article: "Stress Analysis and Accelerated Evaluation of Tin Whisker under Thermal Shock Stress" (Hillman Rebuttal Report, 12/19/14)	Expect
D330			Article: "Tin Whiskers: A Case Study" (Hillman Rebuttal Report, 12/19/14)	Expect
D331			Article: Freescale, "Environmentally Preferred Products FAQs" (Hillman Rebuttal Report, 12/19/14)	Expect
D332			Article: Hynix, https://www.skhynix.com/en/sustainable/green_product/tech_note/lead.jsp (Hillman Rebuttal Report, 12/19/14)	Expect
D333		Xitco Exh. 2	Summary of Records Reviewed by Heather Xitco	May
D334	EGNER000008	Egner Exh. 5	Sony Registration Card	May
D335	BBY000014-000035	Egner Exh. 22	Geek Squad Black Tie Protection Standard and Premium Plans	May
D336		Perry Exh. 2	Perry Report Support Data Table	May
D337	SEL_0011859-0011861		Pokerman VGNNW Touch Pad Issue	Expect

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D338	SEL_0011863-0011865		Pokerman VGNNW1 Touch Pad Issue	Expect
D339	SEL_0041846-0041852		Presentation re Touchpad Sensitivity	Expect
D340		Glasco Exh. 2	Printout from "GUDSKUNC.com"	May
D341			Protocol For Observation and Investigation of Touchpad	Expect
D342	SEL_0065810		Sony, Repair Records from SAP Database	Expect
D343	SEL_0073494		Sony, Spreadsheet regarding extended service plan data	Expect
D344	SEL_0073495		Sony, Spreadsheet regarding extended service plan data	Expect
D345	SEL_0000001-0000006		Sony VAIO Product and Disclaimer Labels	May
D346	SEL_0000183		Sony, "Essential Accessories"	May
D347	SEL_0000191-0000194		Sony, "Thank You" message	May
D348	SEL_0000261-0000264		Sony, "Thank You" message	May
D349	SEL_0000330-0000333		Sony, "Thank You" message	May
D350	SEL_0000336		Sony, VAIO Returns & Support Label	May
D351	SEL_0000399-0000400		Sony, "VAIO VGN-SZ Issues" re touchpad reversal, Summary and Process	May
D352	SEL_0000401		Photo: VGN-SZ Touchpad P/N	May
D353	SEL_0001418-1420		"Comparison with WasabiSR2 #1"	May
D354	SEL_0001421-0001444		Sony, "WasabiSR IRX-3940 SZ Series"	May
D355	SEL_0001496		"VGN-NW Series (9-852-839-06) Parts List"	May
D356	SEL_0001497		"VGN-NW Series (9-852-839-06) Parts List"	May
D357	SEL_0001498		"VGN-NW Series (9-852-839-06) Parts List"	May
D358	SEL_0001499		"VGN-NW Series (9-852-839-06) Parts List"	May

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D359	SEL_0001500		“VGN-NW Series (9-852-839-06) Parts List”	May
D360	SEL_0001501		“VGN-NW Series (9-852-839-06) Parts List”	May
D361	SEL_0001502		“VGN-NW Series (9-852-839-06) Parts List”	May
D362	SEL_0001503		“VGN-NW Series (9-852-839-06) Parts List”	May
D363	SEL_0001504		“VGN-NW Series (9-852-839-06) Parts List”	May
D364	SEL_0001509-0001544		2008 VAIO Service Manual	May
D365	SEL_0001545-0001562		Sony, VGN-SZ Series Service Manual	May
D366	SEL_0001563		“VGN-SZ Series (9-852-366-06) Parts List”	May
D367	SEL_0001564		“VGN-SZ Series (9-852-366-06) Parts List”	May
D368	SEL_0001565		“VGN-SZ Series (9-852-366-06) Parts List”	May
D369	SEL_0001566		“VGN-SZ Series (9-852-366-06) Parts List”	May
D370	SEL_0001567		“VGN-SZ Series (9-852-366-06) Parts List”	May
D371	SEL_0001568		“VGN-SZ Series (9-852-366-06) Parts List”	May
D372	SEL_0001569		“VGN-SZ Series (9-852-366-06) Parts List”	May
D373	SEL_0001570		List of VGN-SZ Specifications	May
D374	SEL_0001571		List of VGN-SZ Specifications	May
D375	SEL_0001572		List of VGN-SZ Specifications	May
D376	SEL_0001573		List of VGN-SZ Specifications	May
D377	SEL_0001505		List of VGN-NW Specifications	May
D378	SEL_0001506		List of VGN-NW Specifications	May
D379	SEL_0001507		List of VGN-NW Specifications	May
D380	SEL_0001508		List of VGN-NW Specifications	May

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D381	SEL_0065411		Bill of Materials Freeze report for VAIO VGN-NW	May
D382	SEL_0073433		Release Date Report for VAIO Series	May
D383	SEL_0073434		Bill of Materials Freeze report for VAIO VGN-EB	May
D384	SEL_0073435		Bill of Materials Freeze report for VAIO VGN-F	May
D385	SEL_0073436		Bill of Materials Freeze report for VAIO VGN-FZ	May
D386	SEL_0073437		Sony VAIO Component Price List	May
D387	SEL_0073438		Bill of Materials Freeze report for VAIO VGN-SZ	May
D388			Plaintiff Egner's NW Series Computer	Expect
D389			Plaintiff Glasco's NW Series Computer	Expect
D390	SEL_0065413		Incremental Update List for VGN-NW240F	May
D391	SEL_0001580		Computer part: TOUCH PAD (SILVER) (1-797-715-53)	May
D392	SEL_0001581		Computer part: TOUCH PAD (DARK SILVER) (1-797-715-63)	May
D393	SEL_0001582		Computer part: TOUCH PAD (1-797-401-91)	May
D394	SEL_0001583		Computer part: TOUCH PAD (1-797-401-92)	May
D395	SEL_0001584		Computer part: FUSE MICRO (1-523-038-21)	May
D396	SEL_0001585		Computer part: 3980 BUTTON TP FP [Carbon Black/Carbon Premium Brown] (3-210-455-01)	May
D397	SEL_0001586		Computer part: 3980 BUTTON TP FP [Mg Black] (3-210-455-11)	May
D398	SEL_0001587		Computer part: HOLDER T/P ASSY (X-2103-507-1)	May
D399	SEL_0001588		Computer part: M850 FFC TOUCHPAD (A-173-231-0A)	May
D400	SEL_0001589		Computer part: '3980 HOUSING PALMREST [Mg Black] (3-210-454-31)	May

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D401	SEL_0001590		Computer part: HOUSING PALMREST [Black Carbon/Premium Carbon] (2-663-458-11)	May
D402	SEL_0001591		Computer part: M850 TOUCHPAD MODULE (1-840-278-11)	May
D403	SEL_0001592		Computer part: SCREW M2 SPECIAL HEAD SELF S (4-676-936-01)	May
D404	SEL_0001593		Computer part: TOUCH PAD (1-797-401-91)	May
D405	SEL_0001594		Computer part: M850 ASMSUB TOP FRAME TOUCHPAD [PALE YELLOW] (4-150-638-11)	May
D406	SEL_0001595		Computer part: TOP FRAME TPAD (4-163-674-41)	May
D407	SEL_0001596		Computer part: M850 TOP FRAME TPAD (PALE) (4-150-638-01)	May
D408	SEL_0001597		Computer part: M850 TOP FRAME TPAD (BROWN) (4-150-638-21)	May
D409	SEL_0001598		Computer part: M855 TOP TAPE TPADFRAME (4-150-639-22)	May
D410	SEL_0001599		Computer part: GRIP, M2 (4-645-214-01)	May
D411	SEL_0001600		Computer part: CABLE, FLEXIBLE FLAT (24 PIN) (1-833-115-11)	May
D412	SEL_0001601		Computer part: SCREW M2 SPECIAL HEAD SELF S (2-677-534-01)	May
D413	SEL_0001602		Computer part: CABLE, FLEXIBLE FLAT (12 PIN) (1-833-111-21)	May
D414	SEL_0001603		Computer part: BUTTON T/P SIM (2-663-431-02)	May
D415	SEL_0001604		Computer part: M850 TOP TAPE TOUCHPAD (4-150-601-21)	May
D416	SEL_0001605		Computer part: 3980 HOUSING PALMREST [Carbon Black/Carbon Premium Brown] (3-210-454-11)	May
D417	SEL_0016331		Computer part: MS90 CABLE TOUCHPAD FFC (1-834-201-11)	May
D418	SEL_0016332		Computer part: MS90 TAPE TOUCHPAD (3-212-491-01)	May

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D419	SEL_0016333		Computer part: MS91 ASMSUB PALMREST [WHITE] NO Felica (X-2178-634-2)	May
D420	SEL_0016334		Computer part: MS91 ASMSUB PALMREST [WHITE] No Oide (A-1473-774-A)	May
D421	SEL_0016335		Computer part: MS90 TOUCH PAD [Black] (1-797-715-41)	May
D422	SEL_0016336		Computer part: MS90 TOUCHPAD BUTTON [Black] (3-212-441-01)	May
D423	SEL_0016337		Computer part: MS91 ASMSUB PALMREST [WHITE] No Oide (A-1473-776-A)	May
D424	SEL_0016348		Computer part: M970 ASMSUB TOP PALMREST [WHITE] (A-1773-444-A)	May
D425	SEL_0016349		Computer part: M970 ASMSUB TOP PALMREST [PINK] (A-1773-447-A)	May
D426	SEL_0016350		Computer part: M970 ASMSUB TOP PALMREST [BLACK] (A-1766-396-C)	May
D427	SEL_0016351		Computer part: M970 ASMSUB TOP PALMREST [GREEN] (A-1773-446-A)	May
D428	SEL_0016352		Computer part: M970 ASMSUB TOP PALMREST [BROWN] (A-1766-398-A)	May
D429	SEL_0016353		Computer part: M970 FFC TOUCH PAD (A-1766-411-A)	May
D430	SEL_0016354		Computer part: M970 ASMSUB TOP PALMREST [BROWN] (A-1766-398-D)	May
D431	SEL_0016355		Computer part: M970 ASMSUB TOP PALMREST [BLUE] (A-1773-445-A)	May
D432	SEL_0016356		Computer part: M971 ASM T PALM L W/O FE(BR) (A-1799-426-A)	May

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D433	SEL_0016357		Computer part: M970 ASMSUB TOP PALMREST [BLACK] (A-1773-443-A)	May
D434	SEL_0016358		Computer part: M971 ASM T PALM H W/O FE (W) (A-1799-417-A)	May
D435	SEL_0016359		Computer part: M971 ASM T PALM H W/O FE (BK) (A-1799-416-A)	May
D436	SEL_0016360		Computer part: M971 ASM T PALM H W/O FE (P) (A-1799-420-A)	May
D437	SEL_0016361		Computer part: M971 ASM T PALM L W/O FE(W) (A-1799-425-A)	May
D438	SEL_0016362		Computer part: M970 ASMSUB TOP PALMREST [BROWN] (A-1766-398-C)	May
D439	SEL_0016363		Computer part: M970 ASMSUB TOP PALMREST [WHITE] (A-1766-397-A)	May
D440	SEL_0016364		Computer part: M971 ASM T PALM H W/O FE (L) (A-1799-418-A)	May
D441	SEL_0016365		Computer part: M970 ASMSUB TOP BUTTON TOUCH PAD [BLACK] (A-1766-399-A)	May
D442	SEL_0016366		Computer part: M970 ASMSUB TOP BUTTON TOUCH PAD [WHITE] (A-1766-400-A)	May
D443	SEL_0016367		Computer part: M970 ASMSUB TOP BUTTON TOUCH PAD [BLUE] (A-1766-401-A)	May
D444	SEL_0016368		Computer part: M970 ASMSUB TOP BUTTON TOUCH PAD [GREEN] (A-1766-402-A)	May
D445	SEL_0016369		Computer part: M970 ASMSUB TOP BUTTON TOUCH PAD [PINK] (A-1766-403-A)	May
D446	SEL_0016370		Computer part: M970 ASMSUB TOP BUTTON TOUCH PAD [BLACK] (A-1766-406-A)	May

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D447	SEL_0016371		Computer part: M970 ASMSUB TOP BUTTON TOUCH PAD [BROWN] (A-1766-408-A)	May
D448	SEL_0016372		Computer part: M970 ASMSUB TOP BUTTON TOUCH PAD [BLACK WITHOUT GLITTER] (A-1773-461-A)	May
D449	SEL_0016373		Computer part: M970 ASMSUB TOP BUTTON TOUCH PAD [PINK] (A-1777-895-A)	May
D450	SEL_0016374		Computer part: M970 TOUCH PAD MODULE ALPS (S) (A-1776-977-C)	May
D451	SEL_0016375		Computer part: TOUCH PAD [Black] (A-1762-389-A)	May
D452	SEL_0016376		Computer part: M931 PLAMREST ASMSUB [Black] (A-1789-677-A)	May
D453	SEL_0016377		Computer part: M930 FFC TOUCHPAD (A-1772-171-A)	May
D454	SEL_0016378		Computer part: M760 TOP TAPE TOUCH PAD (A-1561-702-A)	May
D455	SEL_0016379		Computer part: M931 PLAMREST ASMSUB [Black] (A-1759-305-D)	May
D456	SEL_0016380		Computer part: GD1 HOUSING PALMREST ASSY(P)US (A-1728-045-A)	May
D457	SEL_0016381		Computer part: M971 ASM T PALM L W/O FE(W)IC (A-1809-300-A)	May
D458	SEL_0016382		Computer part: GD1 PALMREST ASSY(S)US (A-1728-047-A)	May
D459	SEL_0065826		Computer part: MS91 ASMSUB PALMREST CUBIC NO Felica (X-2187-172-1)	May
D460	SEL_0065827		Computer part: MS91 ASMSUB PALMREST [BLACK] NO Felica (X-2178-636-2)	May
D461	SEL_0065828		Computer part: MS90 TOUCH PAD [White] (1-797-715-32)	May

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D462	SEL_0065829		Computer part: M970 ASMSUB TOP PALMREST [BLACK] (A-1766-396-D)	May
D463	SEL_0065830		Computer part: M970 ASMSUB TOP PALMREST [BLACK] (A-1773-443-C)	May
D464	SEL_0065831		Computer part: M970 ASMSUB TOP BUTTON TOUCH PAD [WHITE] (A-1766-407-A)	May
D465			Exemplar F Series Laptop - Model: PCG-81114L; Product name: VPCF13AFX; Serial#: 54031834 3001810	May
D466			Exemplar EB Series Laptop - Model: PCG-71318L; Product name: VPCFEB33FM; Serial#: 27532133 3047675	May
D467			Exemplar NW Series Laptop - Model: PCG-7184L; Product name: VGN-NW240F; Serial#: 27505633 3010086	May
D468			Exemplar SZ Series Laptop - Model: PCG-6W3L; Product name: VGN-SZ780; Serial#: 3000001	May
D469			Exemplar SZ Series Laptop - Model: PCG-6S2L; Product name: VGN-SZ650N; Serial#: 28205633 3017418	May
D470	SEL_0066776-0066786	Hillman (2/7/13) Exh. 7	Sony Presentation, "SZ Touchpad"	May
D471	SEL_0072861		Service records for VAIO notebooks	May
D472	SEL_0072862		Sales records for FZ series VAIO notebooks	May
D473	SEL_0072863		Sales records for NW and SZ series VAIO notebooks	May
D474	SEL_0072864		Sales records for EB series VAIO notebooks	May
D475	SEL_0072865		Sales records for F series VAIO notebooks	May
D476	SEL_0072866		Sales records for EB series VAIO notebooks	May
D477	SEL_0072867		Sales records for F series VAIO notebooks	May

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D478	SEL_0072868		Service records for VAIO notebooks	May
D479	SEL_0072869		Service records for VAIO notebooks	May
D480	SEL_0072870		Service records for VAIO notebooks	May
D481	SEL_0072871		Service records for VAIO notebooks	May
D482	SEL_0072872		Service records for VAIO notebooks	May
D483	SEL_0072873		Service records for VAIO notebooks	May
D484	SEL_0072874		Service records for VAIO notebooks	May
D485	SEL_0072875		Service records for VAIO notebooks	May
D486	SEL_0072876		Service records for VAIO notebooks	May
D487	SEL_0072877		Service records for VAIO notebooks	May
D488	SEL_0072878		Service records for VAIO notebooks	May
D489	SEL_0072879		Service records for VAIO notebooks	May
D490	SEL_0072880		Service records for VAIO notebooks	May
D491	SEL_0072881		Service records for VAIO notebooks	May
D492	SEL_0072882		Service records for VAIO notebooks	May
D493	SEL_0072883		Service records for VAIO notebooks	May
D494	SEL_0072884		Service records for VAIO notebooks	May
D495	SEL_0072885		Service records for VAIO notebooks	May
D496	SEL_0072886		Service records for VAIO notebooks	May
D497	SEL_0072887		Service records for VAIO notebooks	May
D498	SEL_0072888		Service records for VAIO notebooks	May
D499	SEL_0072889		Service records for VAIO notebooks	May

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Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D500	SEL_0072890		Service records for VAIO notebooks	May
D501	SEL_0072891		Service records for VAIO notebooks	May
D502	SEL_0072892		Service records for VAIO notebooks	May
D503	SEL_0072893		Service records for VAIO notebooks	May
D504	SEL_0072894		Service records for VAIO notebooks	May
D505	SEL_0072895		Service records for VAIO notebooks	May
D506	SEL_0072896		Service records for VAIO notebooks	May
D507	SEL_0072897		Service records for VAIO notebooks	May
D508	SEL_0072898		Service records for VAIO notebooks	May
D509	SEL_0072899		Service records for VAIO notebooks	May
D510	SEL_0072900		Service records for VAIO notebooks	May
D511	SEL_0072901		Service records for VAIO notebooks	May
D512	SEL_0072902		Service records for VAIO notebooks	May
D513	SEL_0072903		Sell-Thru and service records for VAIO notebooks	May
D514	SEL_0072904		Sell-Thru and service records for VAIO notebooks	May
D515	SEL_ID_0001		Customer service events for VAIO notebooks	May
D516	SEL_0000483		Customer complaint records for VAIO notebooks	May
D517			Federal Rules of Evidence 1006 summaries, charts, or calculations	May
D518			Federal Rules of Evidence 1006 summaries, charts, or calculations	May
D519			Federal Rules of Evidence 1006 summaries, charts, or calculations	May
D520			Federal Rules of Evidence 1006 summaries, charts, or calculations	May
D521			Federal Rules of Evidence 1006 summaries, charts, or calculations	May

Exhibit B to Pretrial Order, Case No. 09-CV-2109 BAS MDD

Sony's Exhibit Number	Bates No.	Depo Exhs.	Description	Expect to Offer/May Offer
D522			Federal Rules of Evidence 1006 summaries, charts, or calculations	May
D523			Federal Rules of Evidence 1006 summaries, charts, or calculations	May
D524			Federal Rules of Evidence 1006 summaries, charts, or calculations	May
D525			Federal Rules of Evidence 1006 summaries, charts, or calculations	May
D526			Federal Rules of Evidence 1006 summaries, charts, or calculations	May

EXHIBIT C

1 **EXHIBIT C TO PRETRIAL ORDER – Case No.: 3:09-cv-02109-BAS-MDD**

2 Pursuant to Civ. L.R. 16.1.f.6.c.5, the list of facts to which the parties hereby
3 stipulate to and thus require no proof and which will be read to and provided to the
4 jury are as follows:

- 5 • Sony Electronics, Inc. sold notebook computers under the Sony VAIO
6 brand name, which during the relevant time period included the VGN-
7 SZ, VGN-NW, VGN-FZ, VPC-EB, and VPC-F.
- 8 • A written one-year Limited Warranty is provided with all five series of
9 Sony VAIO notebook computers at issue.
- 10 • Plaintiff Christina Egner purchased her NW-series Sony VAIO
11 notebook computer at a Best Buy store in New Jersey on December
12 11, 2009.
- 13 • Plaintiff Rickey Glasco purchased his NW-series Sony VAIO
14 notebook computer at a Fry's Electronics store in California on
15 January 9, 2010.
- 16 • Sony issued Service Bulletin No. NB10-59 in October 2010. Sony
17 issued updates to Service Bulletin No. NB10-59 in December 2010
18 (Service Bulletin No. NB10-059R1) and July 2011 (Service Bulletin
19 No. NB10-059R2).
- 20 • ALPS Electric Co., LTD prepared a presentation dated August 23,
21 2010.